

IN THE

**United States Court of Appeals
FOR THE ELEVENTH CIRCUIT**

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IRA KLEIMAN, as the Personal Representative
of the ESTATE OF DAVID KLEIMAN,

Plaintiff-Appellant,
W&K INFO DEFENSE RESEARCH, LLC,

Plaintiff,

—v.—

CRAIG WRIGHT,

Defendant-Appellee.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

**SUPPLEMENTAL APPENDIX
VOLUME X OF XVII**

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TABLE OF CONTENTS

TAB NO.	DESCRIPTION
210	Plaintiffs' Motion to Compel Defendant to Comply with this Court's Orders Directing Him to Produce a List of the Bitcoins He Held as of December 31, 2013
429	Order Granting in Part and Denying in Part Plaintiffs' Corrected Motion for Attorneys' Fees (DE 346), filed March 17, 2020
618	Joint Proposed Jury Instructions, filed September 29, 2020
802-1	Exhibit A to Defendant's Opposition to Motion for a New Trial (DE 861) — Final Jury Instruction Objections
829	Email from Craig S. Wright to Dave Kleiman, dated March 12, 2008
837	Trial Transcript Day 1, dated November 1, 2021
838	Trial Transcript Day 2, dated November 2, 2021
839	Trial Transcript Day 3, dated November 3, 2021
840	Trial Transcript Day 4, dated November 4, 2021
841	Trial Transcript Day 5, dated November 5, 2021
842	Trial Transcript Day 6, dated November 8, 2021
843	Trial Transcript Day 7, dated November 9, 2021
845	Trial Transcript Day 9, dated November 15, 2021

TAB NO.	DESCRIPTION
846	Trial Transcript Day 10, dated November 16, 2021
847	Trial Transcript Day 11, dated November 17, 2021
848	Trial Transcript Day 12, dated November 18, 2021
848	Trial Transcript Day 12, dated November 18, 2021
850	Trial Transcript Day 14, dated November 22, 2021
851	Trial Transcript Day 15, dated November 23, 2021
861	Law360 Article entitled, “No Proof Bitcoin ‘Inventor’ Owed Friend, Juror Tells Law360”
877	Joint Notice and Request for Judicial Ruling on Proposed Redactions to Admitted Trial Exhibits, filed January 31, 2022

843

1 Kleiman's emails don't reflect this either in a moment.

2 MR. FREEDMAN: Before we do that, though, Ms. Vela,
3 would you please play clip 33 from Dr. Wright's deposition
4 about the edits to the Satoshi client?

5 (Video played.)

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, isn't it true that the reason we have not seen
8 emails between you and Dave discussing Bitcoin in 2007 is
9 because you don't have all your emails, correct?

10 A. No. That's not correct. It is because the other person,
11 Dave Kleiman, has not put any forth.

12 MR. FREEDMAN: Counsel, I'm going to the deposition of
13 Craig Wright on March 16th, 2020, lines 1 -- Page 158, line 17,
14 through 158, line 20.

15 MS. MCGOVERN: I'm sorry, could you please --

16 MR. FREEDMAN: 158, 17 through 20.

17 MS. MCGOVERN: 158. One second, Your Honor.

18 (Pause in proceedings.)

19 MR. FREEDMAN: 158.

20 MS. MCGOVERN: So I have Page 158. This is the March
21 16th deposition?

22 MR. FREEDMAN: Yes.

23 MS. MCGOVERN: Okay. Line 17 begins with an answer.

24 MR. FREEDMAN: 16 through 20 -- 17 through 20. Sorry.

25 MS. MCGOVERN: So it's an answer. It begins with an

1 answer? I think that might be incorrect.

2 MR. FREEDMAN: One second.

3 (Pause in proceedings.)

4 MR. FREEDMAN: I'm sorry. Can we have one minute?

5 We've got conflicting transcripts.

6 THE COURT: Certainly.

7 (Pause in proceedings.)

8 MS. MCGOVERN: Objection, Your Honor. Improper
9 impeachment. There's a disconnect on our -- the PDFs are
10 different, but I know what you're reading and we object. We
11 don't believe this is proper impeachment given the question and
12 the answer, Your Honor.

13 THE COURT: Do you want to introduce the testimony?

14 MR. FREEDMAN: Yes.

15 THE COURT: Overruled. It's a party. You're
16 permitted.

17 MR. FREEDMAN: Ms. Vela, can you please play the clip
18 about the emails from 2007.

19 (Video played.)

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, isn't it true it's not only that you purposely
22 used communications that did not preserve a record, but you
23 purposefully tried to wipe out any records that would tie you
24 to Satoshi Nakamoto?

25 MS. MCGOVERN: Objection, Your Honor. Lack of

1 predicate.

2 THE COURT: Overruled. I'll allow it.

3 THE WITNESS: There are two questions there. Number
4 one involves the emails where you're trying to impeach me on.
5 I answered that I deleted some of my emails. That is not the
6 same as deleting Dave's emails.

7 With an email communication, both people have a copy.
8 I said I can't put these into court. The recipient would have
9 those emails. If the recipient had those emails, they can go
10 into court from the recipient. So asking me a reason why
11 they're not in court is very simple. The recipient who has
12 those has not put them in.

13 Now, the second question I answered before, IRC has a
14 complete log. That will be on Mr. Kleiman's -- Dave Kleiman's
15 machines. Dave Kleiman had a lot of machines, a lot of drives,
16 a lot of information. All of that would be there. Yet,
17 mysteriously it's wiped. Anything that supports my argument is
18 wiped. Not by me. So I'm sorry. There's a reason why that's
19 not in court. The drives that had it got mysteriously
20 overwritten.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, I'm going to ask you again. Did you
23 purposefully try to wipe out any records that would tie you to
24 Satoshi Nakamoto?

25 MS. MCGOVERN: Objection. Asked and answered.

1 THE COURT: Sustained.

2 MR. FREEDMAN: Okay. Ms. Vela, can you please play
3 clip 35 of Dr. Wright's deposition.

4 (Video played.)

5 BY MR. FREEDMAN:

6 Q. So you did delete them, Dr. Wright?

7 A. No. I attempted to. The Facebook is still there. I tried
8 to get rid of it. I couldn't. Facebook is horrendously hard
9 to get rid of. I don't know if anyone's tried deleting
10 Facebook properly. Facebook does not like people going. My
11 files are still there. People still have access.

12 Twitter is gone because Jack Dorsey personally kicked me
13 off, so that's not me deleting it.

14 I did try and delete emails but not corporate ones. So the
15 company emails were never changed by me. So I tried. There's
16 a difference between tried and succeeded.

17 Q. Dr. Wright, you did your best to wipe out emails and any
18 other record that would tie you to being Satoshi Nakamoto;
19 isn't that true?

20 A. I tried. I failed.

21 Q. Dr. Wright, you did that because you wanted to ensure there
22 was no record of you being Satoshi left; isn't that correct?

23 A. Not no record, no. That's not correct.

24 MR. FREEDMAN: Ms. Vela, can you please play clip 36
25 from Dr. Wright's deposition.

1 (Video played.)

2 BY MR. FREEDMAN:

3 Q. Not only did you try to make sure there was no record of
4 you being Satoshi left, but you asked Dave Kleiman to help you
5 with that, didn't you?

6 A. Two different events. In 2015, I tried deleting my files.
7 In 2011, I asked Dave to hold access so you're confounding two
8 events again. 2011. 2015. Not the same thing. Sorry.

9 Q. Dr. Wright, isn't it true that the reason Dave Kleiman was
10 willing to help you wipe out anything that had to do with
11 Satoshi was because he was your friend and he was willing to
12 help you get rid of all the past?

13 A. No. He was not getting rid of all the past. He was my
14 friend. He was my best friend. But -- and, yes, he wanted to
15 help me as much as he can.

16 MR. FREEDMAN: Ms. Vela, can you please play clip
17 number 99 from Dr. Wright's deposition?

18 (Video played.)

19 BY MR. FREEDMAN:

20 Q. Dr. Wright, the reason Dave Kleiman doesn't have emails is
21 because you asked him to get rid of all of the past and he was
22 your best friend and he did it; isn't that correct?

23 A. Not even close. The reason Dave Kleiman doesn't have
24 emails is because someone wiped them. That communication with
25 all the past is nothing to do with Dave Kleiman. Dave didn't

1 wipe a thing. And you're, again, confounding my words.

2 MR. FREEDMAN: Ms. Vela, can we please bring up
3 D359 -- in one minute, actually. Hold that for me.

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, you coauthored a paper with Dave Kleiman about
6 wiping hard drives, did you not?

7 A. I did.

8 MR. FREEDMAN: Ms. Vela, can you please bring up D359.
9 Just the witness and counsel.

10 BY MR. FREEDMAN:

11 Q. This is an email from yourself to Dave Kleiman --

12 MR. FREEDMAN: Is this in evidence?

13 THE WITNESS: Yes.

14 MR. FREEDMAN: Sorry, Dr. Wright. Hold on one second.
15 I just want to make sure.

16 THE COURT: Hold on. Let me just verify for you.

17 MR. FREEDMAN: It is?

18 MS. MCGOVERN: No. No. We don't have it admitted,
19 no.

20 THE COURT: 359 is not in evidence.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, do you recognize this as an email from yourself
23 to Dave Kleiman?

24 A. I do.

25 Q. And it attaches the "Overwriting Hard Drive Data Document"?

1 MR. FREEDMAN: Ms. Vela, can you go to the next page
2 for Dr. Wright.

3 THE WITNESS: It appears to, yes.

4 MR. FREEDMAN: Your Honor, Plaintiffs offer D539 into
5 evidence.

6 MR. RIVERO: Judge, if I may, we have it as
7 admitted --

8 THE COURT: I'm sorry, could we have the one attorney?
9 Ms. McGovern?

10 MR. RIVERO: Your Honor, I just wanted to clarify the
11 record and I know it's Ms. -- we have it recorded as admitted
12 and I wanted to make sure. We believe it was admitted with Ira
13 Kleiman. So I just wanted the record to be correct. But
14 that's our records. We may be incorrect, Judge. Maybe we can
15 clarify this later.

16 THE COURT: 359. The record will bear it out, but it
17 is now in evidence. 359.

18 (Defendant's Exhibit 359 previously received into
19 evidence.)

20 MR. FREEDMAN: Can we publish that.

21 Thank you.

22 Go to the next page, please.

23 BY MR. FREEDMAN:

24 Q. "Overwriting Hard Drive Data: The Great Wiping
25 Controversy." Do you see that, Dr. Wright?

1 A. I do.

2 Q. You coauthored this paper about how to wipe hard drives
3 with Dave Kleiman.

4 A. It's not actually about how to wipe hard drives. It states
5 that the fallacy that people were saying, like Professor
6 Gutmann, that you need to wipe 35 times to delete data, were
7 false.

8 Q. It actually takes less than that to wipe a hard drive,
9 right?

10 A. It takes a single overwrite of the entire hard drive to
11 wipe the entire hard drive.

12 Q. So you and Dave Kleiman literally wrote the paper on what
13 it takes to completely destroy digital data?

14 A. That's not how I'd put it, but I wrote the seminal paper on
15 overwriting of hard drives, yes.

16 MR. FREEDMAN: Ms. Vela, can you take that down and
17 please put up P331. Sorry, P333. P333. A lot of 3s. Just
18 for counsel and the witness.

19 BY MR. FREEDMAN:

20 Q. Dr. Wright, do you recognize this as an email chain between
21 yourself and Robert MacGregor?

22 MR. FREEDMAN: Can you scroll down, please.

23 THE WITNESS: Yes, I do.

24 BY MR. FREEDMAN:

25 Q. And do you see in --

1 MR. FREEDMAN: Ms. Vela, can you zoom in to the March
2 31st email from Dr. Wright at the top.

3 No. No. Right there. You're in it. That one.

4 No. No. Just the 31st email.

5 BY MR. FREEDMAN:

6 Q. Do you see you talk about original emails and what you did
7 with them?

8 A. There's nothing about what I did with them, sorry.

9 MR. FREEDMAN: Your Honor, Plaintiffs offer P333 into
10 evidence.

11 MS. MCGOVERN: No objection.

12 THE COURT: Admitted into evidence.

13 (Plaintiffs' Exhibit 333 received into evidence.)

14 MR. FREEDMAN: Ms. Vela, can you zoom back in to that
15 email from Dr. Wright.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, that is an email from yourself on March 31st,
18 2016 to Robert MacGregor and in the second paragraph you say:
19 "As for original emails." It's entitled "London," Dr. Wright.

20 Do you see that the subject is London?

21 A. I do.

22 Q. And it says in 2016 -- this is when you were coming out to
23 the world as Satoshi Nakamoto, right?

24 A. No.

25 Q. And you're responding to a question and you say: "As for

1 original emails, there is little I maintained."

2 Do you see that?

3 A. I do.

4 Q. "As I have stated, it was never even a side plan to
5 return."

6 You meant as Satoshi Nakamoto, did you not?

7 A. That's correct.

8 Q. "I know we discussed it in general, but it is over five
9 years." Do you see that, Dr. Wright?

10 A. Yes.

11 Q. You maintained little of the original communications,
12 didn't you?

13 A. I maintained little of anything. So ...

14 Q. And, Dr. Wright, beyond not preserving and deleting, isn't
15 it true --

16 MS. MCGOVERN: Objection. There's nothing in the
17 record that establishes the non-preservation, Your Honor. I
18 object to that statement.

19 THE COURT: To the question as worded, sustained.

20 Rephrase, please.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, we saw a -- your sworn deposition testimony
23 that Dave Kleiman helped you wipe the past. Do you recall
24 that?

25 A. That's not what my testimony was.

1 Q. And, Dr. Wright --

2 A. You're misstating it --

3 Q. Dr. Wright --

4 A. -- again.

5 Q. -- in addition to that, isn't it true that you did all you
6 could to hide and suppress information concerning the
7 development of Bitcoin itself?

8 A. No. I actually approached the government multiple times.

9 In March of 2009, I approached them. I filed a research and
10 development grant for two of my companies in Australia in June
11 2009, on the 30th.

12 In August, a company that I set up with venture capital
13 funding -- I don't know if you know what venture capital is,
14 but it's -- we had round A funding where a venture capital
15 party gave us money to build equipment we were doing and
16 servers and software to do with systems I wanted to do with
17 Bitcoin.

18 That was from a company called Greyfog. The venture
19 capitalists, of course, ordered all the software. The
20 Australian Tax Office then had that filed. In 2010, we filed
21 with the tax office.

22 We did AusIndustry. We did reports with KPMG. KPMG were
23 our auditors. We had a full audit team at partner level.
24 Deloitte were partly auditing. And Ernst & Young were our
25 internal auditors, but we had two Big Four firms that audited

1 all the research and development.

2 The auditors at KPMG knew who we were. The auditors at
3 Ernst & Young knew who we were. The three branches of the tax
4 office knew who we were. AusIndustry knew who we were.

5 I was filing for banking charter. You see, I wanted to
6 make, I guess you would say, a global commercial banking
7 system. So -- where I could actually do things like having
8 remittance from people in poor areas. Like imagine the
9 corridor between South America and the cost right now. It's
10 huge. So imagine we could make it for a tenth of a cent for
11 people to send back money across from South America to here.
12 It will change everything.

13 So I need a banking charter for that so I had to go to the
14 AUSTRAC people in Australia. They knew. You can't file a
15 banking charter and be secret. So, I mean, how is that secret?
16 If you can tell me how any of that is secret, then I'll admit
17 it's secret.

18 MR. FREEDMAN: Ms. Vela, please bring up P439. Let's
19 go to Page 1 so we can show the jury that we are looking at the
20 book Dr. Wright published, Craig Wright, "Satoshi's Vision:
21 The Art of Bitcoin," and please bring us now to Page 30.

22 Ms. Vela, can you go to the third paragraph from the
23 bottom and can you highlight the sentence that starts: "I did
24 all I could to hide and suppress information concerning the
25 development of Bitcoin."

1 BY MR. FREEDMAN:

2 Q. Do you see that, Dr. Wright?

3 A. I see that.

4 MR. FREEDMAN: Ms. Vela, can you zoom out, please?

5 Go to the next paragraph -- sorry, Ms. Vela. Hold on
6 one second.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, isn't it true that you also did everything you
9 could to muddy the waters around the creation of Bitcoin?

10 A. No. But I tried to make sure that no one found me.

11 MR. FREEDMAN: Ms. Vela, can you go to the next page,
12 please. This time, third paragraph from the -- thank you.

13 BY MR. FREEDMAN:

14 Q. "I did all I could to muddy the waters. I did all I could
15 to stay private."

16 Do you see that, Dr. Wright?

17 A. I see, again, you're confounding the difference between
18 private information shared with governments under restricted
19 covenants and the difference to being in the media. I did not
20 want to be in the media. I did not want to be on TV. There's
21 a big difference.

22 MR. FREEDMAN: Thank you, Ms. Vela. Can you take that
23 down, please.

24 BY MR. FREEDMAN:

25 Q. Dr. Wright, I'd like to leave that topic for now on the

1 emails between you and Dave Kleiman, and move into the amount
2 of Bitcoin that the Plaintiffs allege you and Dave Kleiman
3 mined, okay?

4 A. That's okay by me.

5 Q. First of all, Dr. Wright, do you recall Mr. O'Hagan's
6 testimony that you told him that the Satoshi horde is around
7 one million Bitcoin?

8 A. I know what he said, yes.

9 Q. And, Dr. Wright, we've seen that you told the ATO that you
10 and Dave mined Bitcoin into trusts, correct?

11 A. No, that again is not correct.

12 Q. Dr. Wright, those trusts contained approximately
13 1.1 million Bitcoin in them, did they not?

14 A. One trust had -- well, the trust had companies and the
15 companies had Bitcoin. So I'm going to -- I'm sorry if I'm
16 being pedantic, but the trust didn't own Bitcoin. The company
17 did.

18 MR. FREEDMAN: Ms. Vela, can you please bring up P172.

19 I believe this is in evidence. Is this in evidence?

20 Ms. Vela, can you publish to the jury, please?

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, we're looking at the Australian Tax Office
23 transcript from your August 11th, 2014 meeting.

24 MR. FREEDMAN: Ms. Vela, can you take us to Page 10,
25 please.

1 BY MR. FREEDMAN:

2 Q. On line 17, Dr. Wright --

3 MR. FREEDMAN: Can we zoom in please, Ms. Vela.

4 BY MR. FREEDMAN:

5 Q. You say: "At the start of this, we had 1.1 million
6 Bitcoin."

7 MR. FREEDMAN: Ms. Vela, can you highlight that, line
8 17?

9 Thank you.

10 BY MR. FREEDMAN:

11 Q. Do you see that, Dr. Wright? "At the start of this, we had
12 1.1 million Bitcoin"?

13 A. I can see the line.

14 Q. Dr. Wright, just above that on line maybe 13 you say: "By
15 the time we started looking at actually capitalizing that and
16 around Dave's death."

17 Do you see that?

18 A. I can see that.

19 MR. FREEDMAN: Ms. Vela, can we scroll out a little
20 bit and let's go to line 27. Let's just do the whole from the
21 first highlight all the way down to the bottom so we can read
22 it.

23 No. No. From the first highlight.

24 Thank you.

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, you say: "At the start of this we had
3 1.1 million Bitcoin." You're talking about Dave right above
4 that. Then there's a little bit of a back-and-forth between
5 Mr. O'Mahoney of the ATO, yourself and your attorney, Andrew
6 Sommer, and you -- at line 23, Mr. Sommer says: "But did Coin
7 Ex have 1.1 million Bitcoin?"

8 And Mr. O'Mahoney says: "No." Mr. Sommer says: "Right.
9 Greg -- Greg, you need to be precise with your answers about --
10 is Greg asking about Coin X.?

11 And then you respond: "No. The trust had available
12 Bitcoin."

13 Do you see that?

14 A. I can see the text, yes.

15 Q. So, Dr. Wright, when you say: "At the start of this, we
16 had 1.1 million Bitcoin," you're talking about the trust you
17 had with Dave Kleiman; isn't that correct?

18 A. No. Actually, what you're forgetting is that we had a
19 forensic exercise and accountants come in and they discredited
20 the ATO documents. It turned out, and we demonstrated this
21 with forensic accountants, that the tax office had actually
22 fraudulently changed documents.

23 There was actually an investigation, and the tax office was
24 shown to have altered emails, altered files, and put in false
25 testimony. They wanted to bankrupt me, first of all. They

1 wanted to kill my companies. They wanted to destroy Bitcoin.
2 So this document is a false document.

3 Q. That's quite a claim, Dr. Wright.

4 A. No, it's actually not. It's actually public knowledge.

5 Q. If you would let me finish my question.

6 That's quite a claim, Dr. Wright. Is it your testimony
7 today that the Australian Taxation Office forged documents
8 because they were out to get you?

9 A. No. My testimony is what was found was there was a
10 security vulnerability reported by the tax office. The tax
11 office noted that one of their servers was breached. The tax
12 office said: "It couldn't have been us." And there was a
13 breach in the tax office servers, so someone must have done it.

14 My belief, whether it was someone in the tax office, was
15 very simply justified by a claim by the tax office going: "Oh,
16 well, it's this third party probably broke in, not us."

17 So my testimony is very simple. I've got the report too.
18 You would have received it.

19 Q. Dr. Wright, I am going -- I am going to ask you to prove
20 that this, in fact, happened. Because at closing, I will ask
21 the jury if they saw that proof. You will not prove this
22 happened, Dr. Wright; isn't that true?

23 MS. MCGOVERN: Objection, Your Honor.

24 THE COURT: The objection is sustained as worded.

25 Rephrase.

1 THE WITNESS: I am going to --

2 THE COURT: There's no question pending.

3 MS. MCGOVERN: Objection. There's no question
4 pending.

5 MR. FREEDMAN: There's no question pending,
6 Dr. Wright.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, later in this interview with the Australian Tax
9 Office, you said the same thing, that the trusts had
10 1.1 million Bitcoin in them, did you not?

11 A. Did not.

12 MR. FREEDMAN: Ms. Vela, can you please bring us to
13 Page 18 -- Page 19 of the PDF. And can you please -- thank
14 you.

15 BY MR. FREEDMAN:

16 Q. Mr. O'Mahoney of the Australian Taxation Office:
17 "Dr. Wright, How many Bitcoin were there?

18 "Wright: That I had a loan of or --

19 "Mr. O'Mahoney: No. That were part of this pot.

20 "Wright: The entire pot?

21 "O'Mahoney: Yes.

22 "Wright: 1.1 million."

23 Do you see that Dr. Wright?

24 A. I can see this line, yes.

25 MR. FREEDMAN: Ms. Vela, can you bring us to the --

1 can you zoom out for a moment and can you bring us to the
2 previous page.

3 And can you zoom in right there.

4 BY MR. FREEDMAN:

5 Q. And here, Dr. Wright, on line 31 Mr. O'Mahoney asks you:
6 Where did that pot of Bitcoin sit?

7 Do you see that?

8 A. I can see the line.

9 Q. And you say: "In the Seychelles."

10 Do you see that?

11 A. I can see the line.

12 Q. So, Dr. Wright --

13 MR. FREEDMAN: Ms. Vela, can you put that next to the
14 line -- the page we were just looking at, the next. Page? And
15 the line 15. And can you highlight: "The entire pot."

16 Yeah. Thank you.

17 BY MR. FREEDMAN:

18 Q. So, Dr. Wright, here you say the pot is 1.1 million Bitcoin
19 and on the left you said that pot sat in the Seychelles, right.

20 A. No.

21 Q. Okay. And, Dr. Wright --

22 MR. FREEDMAN: Ms. Vela, you can take that down.

23 BY MR. FREEDMAN:

24 Q. So the Seychelles trust, Dr. Wright, had 1.1 million
25 Bitcoin in it; isn't that correct?

1 A. No.

2 Q. Dr. Wright, isn't that the same Seychelles trust that you
3 said contained assets from Dave Kleiman?

4 A. No.

5 Q. Well, let's look at what you told the Australian government
6 the following week.

7 MR. FREEDMAN: Ms. Vela, please bring up P173.

8 BY MR. FREEDMAN:

9 Q. This is the next week, Dr. Wright.

10 MR. FREEDMAN: Can we publish this?

11 Thank you.

12 BY MR. FREEDMAN:

13 Q. This is Monday, 18th of August, 2014. Again, an Australian
14 Taxation Office interview.

15 MR. FREEDMAN: And, Ms. Vela, can you please bring us
16 to Page 6 and 7. Let's put them side by side, please.

17 And in Page 6, Ms. Vela, can we please highlight where
18 it says: "Was it your decision to set it up in the
19 jurisdiction of the Seychelles?"

20 Yes, Dr. Wright answers.

21 And then, Ms. Vela, on the next page as we're
22 continuing down the interview can we -- yeah. Thank you.
23 Found it faster than me.

24 BY MR. FREEDMAN:

25 Q. So, on the left-hand side, Dr. Wright, you tell the

1 Australian Tax Office in response to: "Was it your decision to
2 set up in the jurisdiction of the Seychelles" -- you say:
3 "Yes."

4 And then, Dr. Wright, on the right-hand side Mr. O'Mahoney
5 says: "So how did it come to be? Are all the assets of the
6 trust -- were they originally sourced from you?" And you say:
7 "And Dave."

8 And he asks you: "And Dave?" And you say: "Yes."

9 Do you see that exchange, Dr. Wright?

10 A. I see the text that you're presenting, yes.

11 Q. So you told the Australian government that the Seychelles
12 trust had 1.1 million Bitcoin and that the trust assets came
13 from Dave Kleiman, didn't you?

14 A. No.

15 MR. FREEDMAN: Ms. Vela, you can take that down.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, you're aware that in this case the Plaintiffs
18 are seeking half of the Satoshi 1.1 million, correct?

19 A. Well, it seems to be all over the place. But at times,
20 yes.

21 Q. It's about 550,000 Bitcoin, correct?

22 A. No.

23 Q. Dr. Wright, haven't you, yourself, admitted -- putting
24 aside our claim -- haven't you, yourself, admitted that at a
25 minimum, 300,000 Bitcoin in the trust belonged to Dave's

1 estate?

2 MS. MCGOVERN: Objection. Objection. Foundation.

3 THE COURT: Overruled.

4 THE WITNESS: No.

5 MR. FREEDMAN: Ms. Vela, can you please bring up P129.

6 Can you zoom in there down to -- no, no, down to the
7 Ira.

8 Thank you.

9 THE COURT: All right. P29 -- 129 is not in evidence.

10 MR. FREEDMAN: Not yet, nope.

11 BY MR. FREEDMAN:

12 Q. Dr. Wright, do you recognize this as an email between
13 yourself and Mr. Kleiman?

14 A. I do.

15 Q. And in this email, Mr. Kleiman is asking you about Bitcoin
16 and trusts. Do you see that?

17 A. I do.

18 MR. FREEDMAN: Your Honor, Plaintiffs offer P129 into
19 evidence.

20 MS. MCGOVERN: No objection.

21 THE COURT: Admitted into evidence.

22 (Plaintiff's Exhibit 129 received into evidence.)

23 MR. FREEDMAN: Can we publish, please?

24 BY MR. FREEDMAN:

25 Q. Dr. Wright, this is March 2nd, 2014. Do you see that?

1 A. Yes.

2 Q. It's less than a month after you first contact the Kleimans
3 to let them know about Dave Kleiman's part in history, correct?

4 A. Yes.

5 Q. And, Dr. Wright, Ira Kleiman writes you an email. He says:
6 "Just to clarify on thoughts from previous email. One of the
7 email exchanges between Dave and you, he mentioned that you had
8 1 million Bitcoins in the trust."

9 You see that?

10 A. I see it.

11 Q. "And since you said he has 300,000 as his part, I was
12 figuring the other 700,000 is yours; is that correct?"

13 Dr. Wright, let's look at your response. You respond that
14 same day -- or it's Australia, so it's the day before, but it's
15 the same day and you say: "Around that minus what was needed
16 for the company's use."

17 Do you see that, Dr. Wright?

18 A. That's the day after.

19 Q. Dr. Wright, do you see the email where you respond to Ira's
20 questions that you have 700,000, Dave has 300,000 and you
21 conceded -- you say: "Around that"?

22 A. I did not concede.

23 Q. Dr. Wright, this email also confirms that the trust's
24 1.1 million Bitcoin was sourced from you and Dave, does it not?

25 A. No, it does not.

1 Q. Dr. Wright, isn't it true that in this litigation you were
2 ordered to produce a list of the Bitcoin you claimed you mined
3 before December 31st, 2013?

4 A. If I had them and I could get them, I would get them.

5 Q. Were you ordered to produce a list of the Bitcoin you mined
6 before December 31st, 2013?

7 A. Technically, a list of what I mined, not my company, is a
8 list of the first 50 Bitcoin, so that's all that is.

9 Q. Did you not understand my question?

10 A. I did.

11 Q. I asked you, Dr. Wright, did you -- were you ordered to
12 produce a list of the Bitcoin you mined before December 31st,
13 2013?

14 A. I do not remember the exact words of the order.

15 MR. FREEDMAN: Ms. Vela, to the witness and counsel,
16 can you please bring up Docket Entry 212.

17 BY MR. FREEDMAN:

18 Q. Dr. Wright, please review the Court's order on the screen
19 and let me know if this refreshes your recollection on what you
20 were ordered to do.

21 A. I do.

22 Q. Can you now testify that you were ordered in this
23 litigation to produce a list of your Bitcoin that you mined
24 before December 31st, 2013?

25 A. Yes.

1 Q. You were, weren't you?

2 A. Yes.

3 Q. And you eventually produced such a list that you claimed
4 were your Bitcoin; isn't that correct, Dr. Wright?

5 A. That is not correct.

6 MR. FREEDMAN: Ms. Vela, can you please put up P554
7 for just the witness and counsel.

8 BY MR. FREEDMAN:

9 Q. Do you recognize this exhibit, Dr. Wright?

10 A. It looks like a file that I forwarded.

11 Q. Dr. Wright, is this the list you provided in response to
12 the Court's order?

13 A. I responded with everything I received. The original list
14 that I gave of only the first 15 addresses is the -- basically
15 what I mined as me, so I've done both.

16 Blocks 1 to 15 are the addresses that Craig Wright mined as
17 Craig Wright. In full, in completion, the end. On top of
18 that, I've sent other files, as well.

19 Q. Dr. Wright, is this the list you provided to satisfy the
20 Court's order that you provide a list of your Bitcoin --

21 MS. MCGOVERN: Objection to the characterization of
22 the production, Your Honor.

23 THE COURT: Overruled.

24 BY MR. FREEDMAN:

25 Q. Is this the list that you provided to satisfy the Court's

1 order that you identify the Bitcoin you mined before December
2 31st, 2013?

3 A. No. The list of the first 15 addresses is the list of
4 Bitcoin I mined as Craig Wright, the Defendant. This is
5 another list that I was given. I'm not a trustee.

6 Q. So you -- sorry. Please finish.

7 A. So I've given every file I've received. I've given every
8 computer for staff members at the time. I've given computers
9 for my accountants at the time. I have not checked them. I
10 have not validated them. I have not verified them. I get
11 something, I hand it to my lawyers to give into the case. That
12 is my duty. I take my duty seriously.

13 MR. FREEDMAN: Ms. Vela, take this down please and for
14 just the witness and counsel, can you please bring up Docket
15 Entry -- oh, P446.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, do you recognize the notice of compliance
18 that's on the screen?

19 A. I do.

20 MR. FREEDMAN: Your Honor, Plaintiffs offer P446 into
21 evidence.

22 MS. MCGOVERN: Objection, Your Honor.

23 THE COURT: And the basis?

24 MS. MCGOVERN: Hearsay, Your Honor. It's a filing by
25 counsel and it's a pleading in the Court and it's hearsay.

1 THE COURT: Overruled. It will be admitted into
2 evidence.

3 (Plaintiffs' Exhibit 446 received into evidence.)

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, this is a filing --

6 MR. FREEDMAN: Can you please publish to the jury.

7 THE WITNESS: Sorry. What was that?

8 BY MR. FREEDMAN:

9 Q. We're going to publish the notice of compliance to the
10 jury, Dr. Wright.

11 A. Uh-huh.

12 Q. Dr. Wright, this document has been filed in this
13 litigation. Do you see the Bates stamp -- the ECF stamp across
14 the top meaning it was received by the Court's e-filing system?

15 A. I do.

16 Q. And it's Ira Kleiman as personal representative of the
17 estate of Dave Kleiman?

18 A. Yes.

19 Q. And W&K Info Defense Research, LLC?

20 A. I do.

21 Q. Versus Craig Wright?

22 A. I do.

23 Q. "Craig Wright's notice of compliance with the Court's
24 January 10th, 2020 order."

25 Do you see that?

1 A. I do.

2 Q. "Dr. Wright files this notice of compliance with this
3 Court's order dated January 10th, 2020."

4 Do you see that, Dr. Wright?

5 A. I do.

6 Q. "Specifically, Dr. Wright notifies the Court that a third
7 party has provided the necessary information and key slices to
8 unlock the encrypted file. And Dr. Wright has produced a list
9 of his Bitcoin holdings as ordered by the Magistrate Judge to
10 Plaintiffs today."

11 Do you see that, Dr. Wright?

12 A. I do.

13 MR. FREEDMAN: Ms. Vela, can you --

14 BY MR. FREEDMAN:

15 Q. And, Dr. Wright, do you see where it says on the bottom:
16 "Rivero Mestre"?

17 A. I do.

18 Q. Those are your lawyers at this table?

19 A. They are.

20 MR. FREEDMAN: Can you go to the next page, please.

21 BY MR. FREEDMAN:

22 Q. Signed by Mr. Rivero himself and Ms. McGovern, right?

23 MS. MCGOVERN: Objection, Your Honor. This is
24 unnecessary with respect to --

25 THE COURT: Sustained.

1 MR. FREEDMAN: Ms. Vela, can you take it down.

2 Ms. Vela, can you put back up P554.

3 BY MR. FREEDMAN:

4 Q. Dr. Wright, does this help refresh your recollection that,
5 in fact, this is the list of Bitcoin you produced in response
6 to the Court's order?

7 A. That contains the list of the first 15 addresses which are
8 the list of Bitcoin I mined. Lines number 2 to 16 are it.

9 Q. What's the rest of the list for, Dr. Wright?

10 A. Company assets.

11 Q. Whose company, Dr. Wright?

12 A. It's owned by my wife.

13 MR. FREEDMAN: Your Honor, Plaintiffs would offer P554
14 into evidence.

15 MS. MCGOVERN: No objection, Your Honor.

16 THE COURT: Admitted into evidence.

17 (Plaintiffs' Exhibit 554 received into evidence.)

18 BY MR. FREEDMAN:

19 Q. Dr. Wright, we have your list of 1,600 -- sorry -- 16,404
20 public addresses.

21 MR. FREEDMAN: Ms. Vela, can you bring us to Page 208.

22 Can you zoom in on the left-hand side so we can see
23 the number of rows with the public addresses on the left-hand
24 side, please.

1 BY MR. FREEDMAN:

2 Q. And you see 16,405 is filled because the first line says it
3 is the key of what everything is, the public address, and the
4 row number?

5 A. That's not a public address.

6 Q. Dr. Wright, do you see it says: "16,405"?

7 A. I do.

8 Q. So it is --

9 MR. FREEDMAN: Ms. Vela, can you zoom back out and go
10 to page 1 again. And can you zoom in on Column D which are the
11 public addresses.

12 BY MR. FREEDMAN:

13 Q. Are those public addresses, Dr. Wright?

14 A. I would have to verify, but they appear to be. They're in
15 standard Bitcoin Number 1 format.

16 Q. Dr. Wright, each and every one of these Bitcoin addresses
17 at the time you produced this list had 50 Bitcoin in it,
18 correct?

19 A. I couldn't tell you.

20 Q. Dr. Wright, what is one thousand -- sorry -- 16,404 times
21 50?

22 MS. MCGOVERN: Objection, Your Honor.

23 BY MR. FREEDMAN:

24 Q. It's not a test, Dr. Wright. It's --

25 THE COURT: Sustained.

1 BY MR. FREEDMAN:

2 Q. It's 820,200, correct?

3 A. Yes.

4 MS. MCGOVERN: Same objection, Your Honor.

5 THE COURT: Sustained.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, you claim you mined the Bitcoin on this list by
8 yourself without Dave; isn't that correct?

9 A. No, I did not.

10 Q. You did not claim it or you did not mine it by yourself?

11 A. I've not claimed that I mined Bitcoin myself. I started a
12 company in Australia called Information Defense. That was
13 formed in January of 2009.

14 I hired Hector as my IT person. Hector Malbburang. He's
15 from the Philippines. I had John Chesher as my accountant. We
16 were running computers in three different data centers. I
17 can't remember. Chris -- I'm sorry. I forgot his last name.
18 John Cable was another person. And I ran a number of machines
19 across those locations.

20 So, the companies owned the machines. The companies owned
21 the premise. The companies owned the Internet connections.
22 The companies paid the electricity. Therefore, as I was hiring
23 an individual to run those computers for me, I didn't mine
24 them. So no, I did not mine. I mined Blocks 1, 2, 3, 4,
25 and -- I'll just do an ellipsis, dot, dot, dot -- 15 and 16.

1 MR. FREEDMAN: Ms. Vela, can you please play clip
2 number 97 from Dr. Wright's deposition of March 18th.

3 (Video played.)

4 BY MR. FREEDMAN:

5 Q. "By myself," Dr. Wright, correct?

6 A. Yes, but does that mean that I'm the only person in my
7 company? No. I had -- I owned 73 percent of the company. 73
8 percent means I'm not the sole shareholder. There were other
9 investors.

10 I admit that I had control. I admit that one of those
11 shareholders was my mother. My mother had shares in my company
12 because -- I don't know about people here, but quite often
13 parents like to invest in their kids. I'm very thankful for my
14 mother doing that.

15 So, technically, I ran it. I controlled it. I told my
16 staff what to do. I had staff. They did it. And I say I did
17 my company's work. I'm not going to take full control over
18 everything my staff did. They deserve credit, too.

19 Q. Dr. Wright, isn't it true that through a number of
20 convoluted means, you controlled all the bearer shares in
21 Wright International Investments?

22 A. There was no convoluted means. I own the one hundred
23 percent in a trust. Convoluted, he says -- is I had a family
24 trust. I set up a family trust right at the beginning. That's
25 part of what annoyed the tax office because I set up this

1 thing, and it made money. And I have set up a tax-effective
2 structure. I'm looking at paying tax now. I'm trying to
3 negotiate with the government how I do that. Am I going to
4 just liquidate everything? No. Convoluted, no.

5 Craig Wright sets up a trust in 1998, changes the name of
6 the trust in 2011. That trust owns Wright International
7 Investment. The Australian companies mine into the foreign
8 company. I think that's simple.

9 MR. FREEDMAN: Counsel, I'm going to the testimony of
10 Dr. Wright at a court hearing that occurred on June 28th, 2019.
11 I'm at Page 157, lines 18 through 22.

12 MS. MCGOVERN: Can I have the citation one more time?

13 MR. FREEDMAN: It's the June 28th, 2019 court hearing,
14 Page 157, lines 18 through 22.

15 MS. MCGOVERN: One second, please. 152?

16 MR. FREEDMAN: 158 -- 157. Lines 18 through 22.

17 MS. MCGOVERN: 157. Okay. One second, please.

18 Okay. No objection.

19 BY MR. FREEDMAN:

20 Q. Dr. Wright, do you remember appearing for a court hearing
21 on June 28th, 2019 when you were put under oath?

22 A. I remember basically, yes.

23 Q. And at that hearing, I asked you the following questions
24 and you gave the following answers:

25 "Question: Dr. Wright, who owned Wright International

1 Investments?

2 "Answer: It was actually held by bearer shares at that
3 stage and managed by Denis and his group.

4 "Question: And who held the bearer shares?

5 "Answer: Through a number of convoluted means, I
6 controlled them."

7 Dr. Wright, you said: "Convoluted means," not me; isn't
8 that right?

9 A. Again, you're taking my testimony and twisting it. The
10 control of the company and how I set up the thing was still by
11 the trust. Denis and the companies were the trust.

12 All I did was made sure that -- as you wanted me to say,
13 it's convoluted because no one seems to understand that trust,
14 foreign entities, ownership. I think it's really simple.

15 Everyone runs around going: "It's convoluted." My lawyers
16 say: "It's complex." My accountants say: "It's complex."
17 It's not. I'm the controller in the past. My wife is now.
18 That's simple. I don't think that's difficult. I mean, yes,
19 we have corporate people appointed. Yes, we have all these
20 other companies to run things. My wife's the trustee now. She
21 sits on top and runs it. I was the trustee before. I sit on
22 top and run it. Yes, I have people hired. Not hard.

23 Q. Dr. Wright, it's your testimony now that the -- well,
24 strike that.

25 Dr. Wright, the Bitcoin that we looked at, the 820 --

1 820,200 Bitcoin, that list, when was that list -- when is the
2 last date that the Bitcoin on that list were mined?

3 A. That was August 2010. But I think it was actually and 50.
4 I think you missed 50.

5 Q. And, Dr. Wright, the -- you say it's 820,250?

6 A. I think so.

7 Q. Okay. And, Dr. Wright, you said you mined some Bitcoin,
8 the first 16 blocks on your own. That was in 2009?

9 A. Yes.

10 Q. January 2009?

11 A. Yes.

12 Q. And it's your testimony here today, Dr. Wright, that the
13 Bitcoin you mined that are on that list were mined for Wright
14 International Investments, correct?

15 A. That were mined by Information Defense PTY, Limited
16 Australia. They were done under a contract to the foreign
17 entity.

18 The reason for this is that I have -- well, basically a lot
19 of overseas money in the past because I helped set up casinos.
20 My background is in gaming. I set up Lasseters Casino which
21 was the first Internet casino that was licensed. Not illegal
22 ones. All government licensed. The government got their tax,
23 et cetera.

24 I helped with other things like Playboy gaming. That
25 always annoyed my wife. I helped with a number of other things

1 that -- so early IPO days of Internet, I helped -- that's how I
2 know Calvin and others in the industry. I helped develop the
3 legal gaming industry outside of America.

4 I held -- so, basically going back into it, the Australian
5 entity needed to be funded without tax legally, so I structured
6 it so the overseas entity could capitalize the Australian one
7 and using -- because I used to be -- worked for an accounting
8 firm as an auditor, we structured the same sort of thing as
9 Google and others do where the money comes in and then the
10 rights go back out so that it's structured that way. So I set
11 up a tax structure that allowed the assets to be held overseas.

12 Q. Dr. Wright, you know it's Plaintiffs' contention in this
13 lawsuit that it was Satoshi Nakamoto that did that mining,
14 correct?

15 A. Well, I know you're saying that, yes.

16 MR. FREEDMAN: Ms. Vela, can you please bring up Joint
17 Exhibit 120.

18 Your Honor, Plaintiffs move Joint Exhibit 120 into
19 evidence.

20 MS. MCGOVERN: No objection.

21 THE COURT: Admitted into evidence.

22 (Joint Exhibit 120 received into evidence.)

23 MR. FREEDMAN: Publish that to the jury, please.

24 BY MR. FREEDMAN:

25 Q. Dr. Wright, this is another message from your Slack channel

1 on ICU MetaNet, correct?

2 A. Correct.

3 MR. FREEDMAN: Ms. Vela, can you highlight that last
4 sentence -- the last paragraph.

5 BY MR. FREEDMAN:

6 Q. "My life goal is to increase the value of the Bitcoin I
7 mined as Satoshi in 2009/2010 to be as great as possible. This
8 will take decades," and: "But, a beneficiary and I set it up
9 so that the 825,000 Bitcoin," right, "will be used for a
10 purpose."

11 Do you see that, Dr. Wright?

12 A. I very much do.

13 MR. FREEDMAN: Ms. Vela, can you take that down,
14 please.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, you mined the Bitcoin in 2009, 2010 as Satoshi,
17 did you not?

18 A. That's a simplified version. I was the CEO of the company.
19 So Satoshi ran Information Defense. Satoshi was the CEO of
20 Wright International Investments. So, technically the CEO of
21 the company.

22 If you look at Elon Musk, he sits there going: "I'm
23 Tesla." Well, just like he does: "I'm Tesla," I did a: "I'm
24 my company." I probably should have actually said: "And my
25 staff." I didn't. Just like Elon doesn't run around doing it.

1 I mean, I'm sorry. I do mean that they are. I mean, I can't
2 do these things without the people who work for me. So I'm
3 sorry I didn't mention them.

4 MR. FREEDMAN: Your Honor, I'm about to start another
5 module that will take a little bit of time. I know we're a
6 little early. I can keep going if the Court wants, but now
7 would be a good time for a break.

8 THE COURT: Ladies and Gentlemen, how are we doing?
9 Is this a good time for a break? Yes.

10 All right. Let's go ahead and take a 20-minute
11 recess.

12 (Jury not present, 3:14 p.m.)

13 THE COURT: All right. We're on a 20-minute recess.

14 MR. FREEDMAN: Your Honor, when we get back, I didn't
15 want to ask in front of the jury because I know you want to use
16 their time, but can we have two minutes to discuss the document
17 you sustained the objection on before the jury gets pulled back
18 in? It's an important document for our case.

19 THE COURT: See you back in 17 minutes.

20 MR. FREEDMAN: Thank you, Your Honor.

21 MS. MCGOVERN: Your Honor, could we just ask what
22 document it is so we can --

23 MR. FREEDMAN: It's the Bitmessage one.

24 MS. MCGOVERN: Okay.

25 (Recess from 3:15 p.m. to 3:29 p.m.)

1 THE COURT: All right. Go ahead and have a seat.

2 Back on the record.

3 What did you want to address, Mr. Freedman?

4 MR. FREEDMAN: Your Honor, I was trying to get in P613
5 and the Court sustained an objection. I just wanted an
6 opportunity to understand what the issue was.

7 THE COURT: You didn't lay the proper foundation, sir.

8 MR. FREEDMAN: So, Your Honor, P051 which is already
9 in evidence, is an example of these Bitmessages that we've --
10 the Court let into evidence yesterday.

11 MS. MCGOVERN: I'm sorry. Which number, Mr. Freedman?

12 MR. FREEDMAN: P051.

13 MS. MCGOVERN: Was that with respect to Jonathan
14 Warren's deposition?

15 MR. FREEDMAN: Yes.

16 THE COURT: Wasn't that through Mr. Warren's
17 deposition?

18 MR. FREEDMAN: It was through Mr. Warren, Your Honor.
19 But the Bitmessages in question were produced to us by
20 Dr. Wright and they purport to be messages by Dr. Wright to
21 Dave Kleiman and from Dave Kleiman to Dr. Wright.

22 In order to use Bitmessage, Your Honor, you have a
23 public address and you have a private key. In order to send a
24 message, you've got to use that private key each time.

25 In discovery, the private key to the address labeled

1 "Dave Kleiman" in these productions was produced to us by
2 Dr. Wright. He's now denying he knows what it was, but that
3 goes to weight, not admissibility. There's no other way to get
4 it in.

5 He acknowledged that it is a public -- it is a private
6 key. It is public addresses to Bitmessage. It's the ones that
7 match Dave Kleiman and Craig Wright. I'm not sure how else to
8 lay a foundation for the document he produced.

9 THE COURT: So, Ms. McGovern, was it, in fact,
10 produced by the Defendant and represented that these were
11 Bitmessages of the Defendant?

12 MS. MCGOVERN: Your Honor, this was a document that
13 has our Bates label on it. The representation that's just been
14 made by Mr. Freedman -- if he could point me to the
15 representation where we said what it is, I have absolutely no
16 basis to say that we said that or would have said that in
17 connection with producing documents.

18 But, again, I appreciate Mr. Freedman's, you know,
19 desire to testify about, you know, what he thinks happened
20 here. But the reality is Dr. Wright was asked foundational
21 questions. They were not established. And the objection was
22 sustained. And there's no -- there's been nothing added to the
23 record that would merit a reconsideration of that ruling.

24 MR. FREEDMAN: Your Honor, I'm happy to try this again
25 with Dr. Wright, but I want to clarify my statement because it

1 seems Ms. McGovern misunderstood.

2 The Bitmessages that were put forward appear to be --
3 were produced by the Defendant and appear to be communications
4 by and between the decedent, Dave Kleiman, and the Defendant,
5 Dr. Wright.

6 The production file that contains the passwords to use
7 these accounts, including to use the account of Dave Kleiman,
8 was produced by the Defendant without any representation. It
9 was located by the Plaintiffs' team and then realized what, in
10 fact, it was.

11 And what that, in fact, means is that whomever had
12 access to that information that's on that Exhibit P613 can send
13 every message that appears on --

14 THE COURT: All right. But there's many documents
15 that reflect DEF. But the question, Mr. Freedman, is: When
16 was it produced? Was it part of a request for a certain item?
17 Did the Defendant at any time -- and I'm not just speaking of
18 the Defendant, Dr. Wright. I'm talking about his agents, the
19 attorneys. Did the attorneys at any time represent that those
20 are the Defendant's Bitmessages? When were they produced?

21 I mean, you haven't laid the foundation through this
22 witness. If, as officers of the Court, this was represented at
23 some time that these are his Bitmessages, and all of a sudden
24 he's saying on the stand they are not, then I agree with you
25 that they should be properly introduced. But I'm not hearing

1 that.

2 MS. MCGOVERN: Your Honor, if I could just make a
3 statement with respect to that, Your Honor, it's this: You
4 know, I'm always reluctant when representations are made on my
5 behalf. And I just want to say if Mr. Freedman would like to
6 show me the representation that he's now saying I made with
7 respect to this document that was produced in this case -- and
8 there were many, many documents -- I would very much like to
9 see that representation.

10 I don't want to be held to maybe making inconsistent
11 statements. But, again, what -- everything that's just been
12 stated by Mr. Freedman was not established with this witness in
13 front of the jury.

14 MR. FREEDMAN: Your Honor, to be clear, I never said
15 Ms. McGovern represented it.

16 THE COURT: But they're all Bates stamped. They are
17 numbered. Was it in a response to a particular request for
18 production? I mean, if you can establish that to the Court,
19 fine. Otherwise, you haven't laid the proper foundation
20 through this witness.

21 MR. FREEDMAN: Your Honor, the requests for production
22 were done via keyword searches because of the volume of
23 documents, so it hit on the "Dave Kleiman" keyword search.
24 That's why it was produced in discovery. I can't point the
25 Court to a specific request for production.

1 And I want to be clear. The Bitmessages are in
2 evidence. That's not what I'm asking about. The document I'm
3 talking about is literally a list of passwords to use the
4 Bitmessages that are already in evidence.

5 THE COURT: You can try to lay the foundation, but at
6 this point the objection is sustained.

7 MR. FREEDMAN: Okay. Thank you, Your Honor.

8 THE COURT: All right.

9 MR. RIVERO: Your Honor, I have one housekeeping
10 matter.

11 THE COURT: Mr. Rivero?

12 MR. RIVERO: No, just one housekeeping matter. On
13 Exhibit 359 -- and I want to defend my crack paralegal, Sarah
14 Gonzalez -- we went back to the day four p.m. rough draft and
15 it had been -- I have it here, Judge. I moved the admission of
16 359. Mr. Brenner said: "No objection, Your Honor."

17 THE COURT: But that was Defendant's 359.

18 MR. RIVERO: That's Defendant's 359. Have I got it
19 backwards, Judge?

20 MR. BRENNER: The mistake was -- Judge, we all thought
21 Mr. Freedman said: "P359." He was saying: "D359."

22 THE COURT: Oh, I thought he said: "P."

23 MR. BRENNER: We all did.

24 THE COURT: Okay.

25 MR. RIVERO: Oh, I'm sorry, Judge. I thought he said

1 "D." Yeah, okay.

2 THE COURT: All right. So he was attempting to get in
3 D359 which is already in evidence?

4 MR. BRENNER: And I think P359 is not, nor has it been
5 introduced.

6 MR. RIVERO: I thought I'd clarify the record.

7 And thank you, Mr. Brenner. I appreciate it.

8 MR. BRENNER: I think we all heard the same thing,
9 Judge.

10 MR. RIVERO: Judge, I will defend Ms. Gonzalez, who is
11 being very careful about this.

12 THE COURT: All right. Let's go ahead and bring in
13 the jury.

14 (Before the Jury, 3:36 p.m.)

15 THE COURT: All right. Welcome back, Ladies and
16 Gentlemen. Please be seated and we'll continue with the
17 questioning.

18 MR. FREEDMAN: Ms. Vela, could you please bring up
19 P051. This is already in evidence.

20 And can you zoom in on that?

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, do you recognize this as Bitmessage -- as the
23 Bitmessage software printout of the Bitmessage software?

24 A. It's too blurry. No, I can't.

25 Q. Do you see it says: "Craig S. Wright" on the left side?

1 In the first column on the left-hand side it says: "Craig S.
2 Wright"?

3 A. Yes, but I can't see the keys.

4 Q. We're going to get down there, Dr. Wright.

5 Do you see where it says: "Dave Kleiman" on the right side
6 as the "from"?

7 A. Yes, but that's not part of a Bitmessage thing. You'd have
8 to actually drill in. So I can't say that's Craig Wright or
9 Dave Kleiman. Sorry.

10 Q. So, Dr. Wright, this is -- this purports to be on paper a
11 message that's sent from Dave Kleiman to Wright. Do you see
12 that?

13 A. No, it doesn't. Bitmessage doesn't have the names of
14 people in it. So, no, it doesn't.

15 Q. And, Dr. Wright, the subject of the message says: "Re:
16 scripted money, scripted money, scripted money, insignia, the
17 trust and loan," apparently coming from Dave Kleiman.

18 Do you see that?

19 A. I see subject lines but that doesn't say from Dave Kleiman
20 actually. There's no attribution to a person in Bitmessage.
21 So, no, I cannot say it's Dave Kleiman.

22 Q. It says: "Dave Kleiman appendix, Dave Kleiman Tulip Trust,
23 Dave Kleiman Tulips, Dave Kleiman 1933, Dave Kleiman, the trust
24 process."

25 Do you see that, Dr. Wright?

1 A. I can see the document.

2 Q. And there are on the right-hand column the time in which
3 these messages were purportedly received? You see it says:
4 "Received"?

5 A. I can see a time there, yes.

6 Q. And you heard from Jonathan Warren, creator of this
7 program, some of these messages at the bottom were received
8 before the program was even created. Do you recall that?

9 A. I recall that he said that it didn't come out till then.
10 But if you look at the Wiki, you'll see that the Wiki was on
11 the 1st of October, which is still public. You go to the
12 Wayback Machine, you find that the launch of product publicly
13 was on the 1st of October, so he must have got that confused.

14 The domain registration was in middle of April of that
15 year. I guess he got that confused too. He may have forgotten
16 that he actually registered the domain in April. He may have
17 forgotten that he did it on there.

18 He seems to have forgotten that Atheros, the account that
19 he used that he wants to distance himself from, was actually
20 chased down for Silk Road use. But, unfortunately, if it's
21 released on the 1st of October and the record's on the
22 Internet, you can't be arguing that it's not.

23 MR. FREEDMAN: Ms. Vela --

24 BY MR. FREEDMAN:

25 Q. Do you see, Dr. Wright, before we move forward -- do you

1 see that this line is highlighted: "Craig S. Wright, Dave
2 Kleiman 1933, Sunday, 11th of November, 2012, 4:22 a.m."?
3 That's the selected message, right?

4 A. I can see the highlight.

5 MR. FREEDMAN: Ms. Vela, can you zoom in on the actual
6 text of the purported message from Dave Kleiman.

7 BY MR. FREEDMAN:

8 Q. "Sir, I will transfer the smaller amounts into the 1933
9 address before I return it to you. Makes it simpler. Then it
10 and the one paper wallet is all we need to secure back to you.
11 I will move" -- there's a Bitcoin address and another Bitcoin
12 address -- "into 1933 shortly but you should see it come in
13 later this week. I have been a little under the weather of
14 late so forgive any delay. This will add the last four --
15 "five thousand plus and we can move the small change into this
16 soon after and get the amounts up to the agreed total.

17 Regards, Dave."

18 Do you see that, Dr. Wright?

19 A. I need glasses. I can make out a couple words, but no.
20 Sorry, I can't.

21 Q. Is that the sum and substance of a message Dave Kleiman
22 ever sent you through Bitmessage?

23 A. No. The Bitmessages that I sent between Dave and myself
24 were set up using his publicly known and own email addresses on
25 list server PGPs that are provably sent to him.

1 That PGP was put at one stage on security focus under his
2 email address many years before he died, and that was signed in
3 some of the messages. So the ones with -- if there's not PGPs
4 signed within this, then they're not his.

5 Q. So is it your testimony in this litigation that every
6 Bitmessage that purports to be from Dave Kleiman to Craig
7 Wright that does not have a PGP key is a forgery?

8 A. I'm purporting that this is not even a Bitmessage. This is
9 a picture.

10 Q. And, Dr. Wright, isn't it true that to send a Bitmessage
11 you need a private key?

12 A. No, not necessarily. There are a few different formats.
13 Both of the ECDSA and the RSA version of the key require a key.
14 But there is actually a way of doing it through a hash
15 signature. So, there is a way of having a non-signed
16 Bitmessage. So not all of the formats; two of them are.

17 Q. But it is possible to send a Bitmessage. If you have the
18 private key to the public address in Bitmessage, you can then
19 send a Bitmessage from that address, correct?

20 A. With a private key, you can send a Bitmessage, yes.

21 Q. And isn't it true that whomever has the private key to the
22 Bitmessage would be able to send that message? Correct?

23 A. Yes.

24 MR. FREEDMAN: Ms. Vela, can you please bring up P613
25 to only counsel and the witness, please.

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, at the top of this it says --

3 MS. MCGOVERN: Objection, Your Honor. You sustained
4 the objection to this document.

5 THE COURT: 163. All right. Let's continue.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, at the top of this, do you see it says:

8 "Bitmessage settings"?

9 A. I can see that.

10 Q. And then at the bottom of this, it bears the name of
11 somebody we're talking about in this litigation, correct?

12 A. No, that's not correct. His name's there but it's a label.
13 So it's just a text field that anyone can put anything in. It
14 doesn't represent a name.

15 Q. And it's associated -- that name, that label, is associated
16 with the Bitmessage address that is listed right on top of it
17 in brackets, correct?

18 A. That's in the settings for that one, yes.

19 Q. And then do you see two up from the bottom there's a line
20 that says: "Private encryption key"? Do you see that?

21 A. I do.

22 Q. And above that, it says: "Private signing key." Do you
23 see that?

24 A. I do.

25 Q. And so whomever has these keys that are listed in this

1 document would then be able to control the Bitmessage that
2 bears the label of that individual, correct?

3 A. Well, no, sir. That's actually technically correct --
4 incorrect. The label can be anything. You could send it,
5 change it, send it, change it. It's like in your email where
6 you can put down what your name is. Your email address might
7 be the same, but you could call yourself Bob or Robert or --
8 and you can change your name in the field. And you could put
9 your name down as Bill Gates and have -- well, the same email
10 address but call yourself Bill Gates, so no.

11 MR. FREEDMAN: One second, Your Honor.

12 BY MR. FREEDMAN:

13 Q. Dr. Wright, is it not true that you did communicate with
14 Dave Kleiman via Bitmessage?

15 A. It is true, but none of the Bitmessages I communicated to
16 Dave Kleiman are here.

17 Q. And then, Dr. Wright, do you recognize the Bates label at
18 the bottom of this document?

19 A. Yes. My lawyers put in the computers of --

20 MS. MCGOVERN: Dr. Wright, please.

21 I'd like to object to any communications that might
22 run into the privilege between attorney-client, Your Honor.

23 THE COURT: Certainly with regard to any communication
24 between Dr. Wright and his attorneys.

25 You may continue, sir.

1 THE WITNESS: Yes. I submitted files from computers
2 from 17 countries that existed over four continents, involving
3 multiple staff, and I don't know which particular computer this
4 comes from.

5 BY MR. FREEDMAN:

6 Q. Dr. Wright, in order to submit documents through your
7 lawyers to us in discovery, you had to have control over those
8 machines to some extent, correct?

9 MS. MCGOVERN: Objection, Your Honor. Calls for a
10 legal conclusion.

11 THE COURT: Overruled.

12 THE WITNESS: No.

13 BY MR. FREEDMAN:

14 Q. You gathered documents from various computers across the
15 world, correct?

16 A. No.

17 Q. You had documents gathered from various computers across
18 the world, correct?

19 A. No, I asked other people to give files, including ones that
20 had been sealed, to the lawyers. So other people, without
21 going through me. None of it touched me. Went directly to my
22 lawyers.

23 Q. So, someone that you sent a request for assistance to to
24 send you files eventually produced this document at your
25 request, correct?

1 A. I don't know. I sent the computers to the lawyers. That's
2 the end. Don't know.

3 MR. FREEDMAN: And, Your Honor, if I could have one
4 moment.

5 (Pause in proceedings.)

6 MR. FREEDMAN: And, Ms. Vela, can you bring us to the
7 next page. And one more page over.

8 BY MR. FREEDMAN:

9 Q. And, Dr. Wright, in the middle of this page is another
10 label of another individual at issue in this litigation. You
11 see that name, Dr. Wright?

12 A. I see that you can type in any name you want at any
13 location at any time and change it. In fact, you can update --
14 so I could send -- like, if you're using Bitmessage, you could
15 change it as you go. You could send one and then change it and
16 change it and change it and change it. So, you could make it
17 A, and then B, and then C, and then D, back to A, and then B.

18 And the funny thing is when you change it, everything will
19 display one way and then it will display the other way. And
20 then it will display the next one, and the next one, and back
21 and forth all day long. And it has no meaning whatsoever
22 because this doesn't represent the actual person.

23 Q. And, Dr. Wright, do you see above there there's a
24 Bitmessage public address?

25 A. Yes. It's not mine.

1 Q. And, Dr. Wright, do you see underneath that it says
2 "private signing key and private encryption key"?

3 A. Yes. They are different from my ones.

4 Q. And, Dr. Wright, anyone who has the private encryption key
5 and the private signing key for these that are listed on this
6 document would be able to control the Bitmessage address that's
7 above the label with your name on it, correct?

8 A. Yes, but that's not mine.

9 MR. FREEDMAN: Okay. At this point, Plaintiffs would
10 offer P613 into evidence.

11 MS. MCGOVERN: Objection, Your Honor. The witness has
12 testified that he doesn't recognize the document and the only
13 basis --

14 THE COURT: The objection is sustained.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, let's talk about the Tulip Trusts a little
17 more. Okay?

18 A. (No verbal response.)

19 Q. That's the trust, Dr. Wright, that you claim currently
20 controls all of your Bitcoin, correct?

21 A. No, it controls the company.

22 Q. Which control your Bitcoin?

23 A. The companies own assets. There's two main companies that
24 own Bitcoin. There's some smaller amounts in other companies,
25 but they're insignificant.

1 Q. Trust control companies and companies own Bitcoin, correct?

2 A. Yes.

3 Q. Okay. And in this case, it's Tulip Trust owns companies
4 which owns the Bitcoin at issue, correct?

5 A. Yes.

6 Q. In fact, Dr. Wright, as we saw, the Tulip Trust is the
7 trust that Dave funded with Bitcoin, is it not?

8 A. No, Dave never had anything to do with Tulip Trust. The
9 Tulip Trust was first in a court case in 2004 in Australia and
10 has been basically, well, mine since it was set up from 1998
11 until I handed over control to my wife sort of a few years ago
12 before this case started, and it's still in her control.

13 Q. And, Dr. Wright, we have seen already the transcript of the
14 Australian Tax Office where you told them that you and Dave
15 funded -- are the source of the assets of the Tulip Trust, have
16 we not?

17 MS. MCGOVERN: Objection. Misstates the record.

18 THE COURT: The basis?

19 MS. MCGOVERN: It mischaracterizes the testimony, Your
20 Honor.

21 THE COURT: Overruled.

22 THE WITNESS: No. As I said, and as you will find out
23 before this case is over, that there are forensic documents
24 validating what I said. The ATO was compromised. The forensic
25 evidence did prove to that being done in 2005 or earlier.

1 And yes, that will be put forth. So, no, none of
2 those things have anything to do with the ATO being accurate.
3 There were lots of falsified documents and lots came from the
4 ATO. And, no, I will not at any point say that they had
5 anything to do with the ATO because they are not.

6 MR. FREEDMAN: Ms. Vela, could you please bring up
7 P607 that I believe is in evidence.

8 But can we just make sure it is before we publish?

9 It's in evidence. Please publish.

10 Ms. Vela, can you bring us to Page 49.

11 THE COURT: 607 is in evidence.

12 MR. FREEDMAN: And can you zoom in on Paragraph 271.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright has also stated two lines up from the bottom
15 that the trust -- well, do you see it says: "Tulip Trust"
16 right in the second line?

17 Mr. Kleiman -- I told you we were going to talk about this,
18 Dr. Wright, so I'm bringing us back here. "Dr. Wright and
19 Mr. Kleiman's Tulip Trust document." I told you we'd talk
20 about that, remember?

21 A. You said it, yeah.

22 Q. "Claimed that Dr. Wright contributed 1.1 million Bitcoin to
23 the Tulip Trust. But Dr. Wright has also stated that the trust
24 Bitcoin came from both him and Mr. Kleiman."

25 Do you see that?

1 A. I can see that, yes.

2 Q. And we also saw that the ATO found that Ms. Nguyen, a
3 trustee of the Tulip Trust, has stated that 650,000 Bitcoin of
4 the trust came from you.

5 MR. FREEDMAN: Ms. Vela, can we go down to the next
6 page.

7 BY MR. FREEDMAN:

8 Q. And 350,000 from Mr. Kleiman. Do you see that?

9 A. I can see the document.

10 Q. And, Dr. Wright, in this action --

11 MR. FREEDMAN: Ms. Vela, you can take that down.
12 Thank you.

13 BY MR. FREEDMAN:

14 Q. You've produced documents that purport to describe the
15 terms of Tulip Trust, have you not?

16 A. In this case, you mean?

17 Q. Yeah.

18 A. Yes.

19 Q. And, Dr. Wright, you've sworn that these documents are
20 authentic, haven't you?

21 A. They are authentic, so yes.

22 MR. FREEDMAN: Ms. Vela, can you please bring up P822
23 for just the witness and opposing -- and counsel.

24 BY MR. FREEDMAN:

25 Q. Dr. Wright, do you recognize this as your sworn declaration

1 you submitted in this Court?

2 A. I do.

3 Q. And do you see it talks about the Tulip Trust?

4 A. No. It talks about Tulip Trust I and Tulip Trust II.

5 These are the structures that I had around Tulip Trust and The
6 Trust.

7 As I had noted, I also set up something that I called The
8 Trust, and I set up another thing that I called the Tulip
9 Trust. I had been officially banned from all of my companies
10 from ever naming anything ever again.

11 But the nature of this -- and I've now got a patent on
12 it -- was to set up an algorithmic system that allowed multiple
13 parties such as directors to be able to vote and do digital
14 signing for companies without having to -- if there are five
15 people, for instance, three people could vote and you wouldn't
16 need to have anyone know who voted or not. And the company
17 could take actions like a secret vote.

18 So, I set up that algorithmic structure. I ran it and
19 tested it on my own things, and part of what we were talking
20 about here is trying to explain the difference between the
21 holding of key shares and the actual trust. They're different.

22 Q. Dr. Wright, do you see the document says the words: "Tulip
23 Trust" on it?

24 A. It says: "Tulip Trust I" and it says: "Tulip Trust II."
25 Yes, I see that.

1 Q. So, it says the words "Tulip Trust"?

2 A. The word Tulip Trust taken out of context as just Tulip
3 Trust would be wrong. That would be like saying my name says:
4 "Craig Steven." My name is Craig Steven Wright. If you put
5 Craig Steven, you get the person my mother named me after. She
6 liked this actor called Craig Stevens. I don't know why. I
7 mean, he's okay. He's old now.

8 MR. FREEDMAN: Your Honor, Plaintiffs offer P822 into
9 evidence.

10 MS. MCGOVERN: No objection.

11 THE COURT: Admitted into evidence.

12 (Plaintiffs' Exhibit 822 received into evidence.)

13 BY MR. FREEDMAN:

14 Q. Dr. Wright --

15 MR. FREEDMAN: Can you please publish to the jury.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, we're looking at something entitled
18 "Declaration of Dr. Craig S. Wright" submitted in this
19 litigation. You see the court ECF stamp across the top?

20 A. I do. I recognize it.

21 Q. You see the case caption on the left side?

22 A. Yes.

23 Q. It's called "Declaration of Dr. Craig S. Wright." And it
24 begins: "I, Craig S. Wright, declare under penalty of perjury
25 under the laws of United States of America that the following

1 is true and correct"?

2 A. Yes.

3 MR. FREEDMAN: Ms. Vela, can you bring us to the last
4 page of the document so we can see Dr. Wright's signature.

5 BY MR. FREEDMAN:

6 Q. It's your signature, Dr. Wright?

7 A. It is.

8 Q. Signed on May 13th, 2019?

9 A. It is.

10 Q. And again: "I declare that the foregoing is true and
11 correct under penalty of perjury and in accordance with the
12 laws of United States of America"?

13 A. I do.

14 MR. FREEDMAN: Ms. Vela, can you bring us back to the
15 first page. And can you call out Paragraph 4 for us.

16 BY MR. FREEDMAN:

17 Q. "I attach to this declaration the trust document dated June
18 24th, 2011 which is referenced in Paragraph 5 of my May 8th,
19 2019 declaration. This document is an authentic copy."

20 Do you see that?

21 A. Yes.

22 Q. Trust document dated June 24th, 2011. You swear it's
23 authentic, correct?

24 A. Yes.

25 Q. All right. Let's take a look at the document dated June

1 24th, 2011 that you attached.

2 MR. FREEDMAN: Ms. Vela, can you please bring up P035.

3 BY MR. FREEDMAN:

4 Q. And do you see this is an email from -- purports to be an
5 email from you to Dave Kleiman -- from Dave Kleiman to you?

6 A. Yes, I do.

7 Q. And it says: Tulip Trust?

8 A. Mentions .PDF, dot -- et cetera, yes.

9 Q. No I, no II, just Tulip Trust, right?

10 MS. MCGOVERN: Objection, Your Honor. The document
11 speaks for itself.

12 THE COURT: Overruled. I'll allow it to be pointed
13 out.

14 THE WITNESS: There are files attached.

15 BY MR. FREEDMAN:

16 Q. No. No. Dr. Wright, what I said was the attachment name
17 does not contain a I or a II. It just says: "Tulip Trust,"
18 right?

19 A. But that's a different thing all together. So trying to
20 explain this in the document was a different thing than the
21 other.

22 Q. Sorry, Dr. Wright. Maybe you didn't understand what I
23 asked. All I said is: Is there a I or II in that attachment?

24 MS. MCGOVERN: Same objection, Your Honor.

25 THE COURT: Overruled. I'll allow it.

1 THE WITNESS: No.

2 BY MR. FREEDMAN:

3 Q. Thank you.

4 MR. FREEDMAN: Your Honor, Plaintiffs' offer P035 into
5 evidence.

6 MS. MCGOVERN: No objection, Your Honor.

7 THE COURT: Admitted into evidence.

8 (Plaintiffs' Exhibit 035 received into evidence.)

9 MR. FREEDMAN: Can we please publish to the jury.

10 BY MR. FREEDMAN:

11 Q. Dr. Wright, this purports to be an email from Dave Kleiman
12 to you on Friday, June 24th, 2011. Do you see that?

13 A. I do.

14 Q. Purports to attach various attachments that are entitled
15 "Tulip Trust." Do you see that?

16 A. I do.

17 Q. And the body purports to say: "Craig, I think you are mad
18 and this is risky but I believe in what we are trying to do."

19 Do you see that?

20 A. I do.

21 MR. FREEDMAN: Ms. Vela, can you put that on the
22 left-hand side, and let's bring up P822.

23 BY MR. FREEDMAN:

24 Q. Again, this is your sworn declaration, Dr. Wright. "I
25 attach" -- I'm at Paragraph 5 now. "I attach to this

1 declaration the trust document dated October 23rd, 2012 which
2 is referenced in Paragraph 5 of my May 8th, 2019 declaration as
3 Tulip Trust I. This document is an authentic copy."

4 Do you see that?

5 A. Yes, it's a copy.

6 MR. FREEDMAN: Ms. Vela, can you please put down the
7 one on the left-hand side and let's bring up what Dr. Wright
8 swore was an authentic copy of the October 23rd, 2012 trust
9 document, which is P036.

10 That cannot go to the jury yet. It's not yet in
11 evidence. So why don't we take everything down and we'll just
12 bring up P036.

13 No, P036.

14 (Pause in proceedings.)

15 BY MR. FREEDMAN:

16 Q. Okay. Dr. Wright, do you see this is a "Deed of Trust"
17 dated October 23rd, 2012 that also contains the words Tulip
18 Trust on it?

19 A. Yes, I do.

20 MR. FREEDMAN: Your Honor, Plaintiffs offer P036 into
21 evidence.

22 MS. MCGOVERN: No objection, Your Honor.

23 THE COURT: Admitted into evidence.

24 (Plaintiffs' Exhibit 036 received into evidence.)

1 MR. FREEDMAN: Can we publish this to the jury,
2 please?

3 Can we zoom out? Zoom out.

4 BY MR. FREEDMAN:

5 Q. This is the document you swore was authentic in your
6 May declaration, correct, Dr. Wright?

7 A. I believe that's the same document. I can't see the
8 attachment, but this is a trust document from the trust, yes.

9 MR. FREEDMAN: Okay. Ms. Vela, can you put that down
10 and let's go back to the first document Dr. Wright swore was
11 authentic, which is P035.

12 BY MR. FREEDMAN:

13 Q. So, Dr. Wright, we looked at this cover attachment from
14 this supposed email from Dave Kleiman saying: "I think you're
15 mad and this is risky." Let's take a look at the attachments.
16 Okay?

17 And, Dr. Wright, it starts off as a letter: It says: "To
18 Whom it May Concern," with a cc to Dr. Craig Wright.

19 It starts off -- it says: "It is agreed that" --

20 MR. FREEDMAN: Ms. Vela, can you highlight the
21 sentence under that.

22 BY MR. FREEDMAN:

23 Q. "I, Dave Kleiman, shall become the trustee for the transfer
24 of the Satoshi I have received from Craig Wright."

25 Do you see that?

1 A. I do.

2 Q. Satoshi is another way of referring to Bitcoin, right?

3 A. Yes. It's like cents versus dollars, yes.

4 Q. And then underneath it says: "I acknowledge." And in the
5 paragraph right underneath that it says: "I, Dave Kleiman,
6 have received 1,100,111 Bitcoin from Craig Wright"?

7 THE COURT: Mr. Freedman, if I may ask, is this
8 Exhibit 36 or is this another exhibit, sir?

9 MR. FREEDMAN: It is Exhibit 35, Your Honor.

10 THE COURT: All right. Then it is in evidence. It
11 may be published.

12 MR. FREEDMAN: I'm sorry. Was it on the screen for
13 the jury this time or --

14 THE COURT: I do not believe that it was, but it is
15 now.

16 MR. FREEDMAN: It was not?

17 THE COURT: It is on the screen, Ladies and Gentlemen?

18 All right. Thank you.

19 MR. FREEDMAN: Okay. Let's go back just to the first
20 page, Ms. Vela, so we can reorient ourselves.

21 BY MR. FREEDMAN:

22 Q. This is the email from Dave Kleiman we looked at earlier
23 that you swore was authentic. Dave Kleiman to you dated 24th
24 of June, 2011. It's the email you swore: "Craig Wright, I
25 think you are mad and this is risky but I believe in what we

1 are trying to do," correct?

2 A. No, that is not correct.

3 Q. All right. Let's move to the next page and let's see the
4 attachment to this email that you swore was authentic in May.
5 Purports to be the attachment that you attached to your email
6 and it appears to be a letter from David Kleiman, correct?

7 A. That's what it appears to be cc'd as. What I did say,
8 though, I said it was a copy. I did not say it was an original
9 or anything. I said: "Yes. It appears to be a copy."

10 Q. Dr. Wright, this letter then says: I, Dave Kleiman, shall
11 become the trustee for the transfer of the Satoshi I have
12 received from Craig Wright."

13 Do you see that?

14 A. I do.

15 Q. Then it purports to say: "I acknowledge I, Dave Kleiman,
16 have received 1,100,111 Bitcoin from Craig Wright of 51
17 Cowangarra Road, Bagnoo, New South Wales, Australia."

18 Do you see that?

19 A. I do.

20 Q. And then two lines underneath that, it says: "All Bitcoin
21 will be returned to Dr. Wright on January 1st, 2020."

22 Do you see that?

23 A. I do.

24 Q. So, if this document is to be believed, Dr. Wright, Dave
25 Kleiman has no right to the 1.1 million Bitcoin that you mined.

1 It's all yours. He's just the trustee and he's returning it
2 all to you on January 1st, 2020, correct?

3 A. Yes. I wrote this document in 2011 and the company is the
4 owner.

5 MR. FREEDMAN: Ms. Vela, can you put the attachment to
6 the email down.

7 Let's go back to the first page which is the actual
8 cover email itself.

9 Can you zoom in on that email.

10 BY MR. FREEDMAN:

11 Q. Dr. Wright, you see this email is dated Friday, June 24th,
12 2011?

13 A. I do.

14 Q. Isn't it true, Dr. Wright, that you forged this document?

15 A. No, it is not.

16 Q. Isn't it true that this document is a fake?

17 A. I don't know if this is the original or not, but this
18 document and all that are in it were given to the tax office in
19 2012.

20 I was before a court proceeding with the tax office who had
21 attempted to bankrupt me. And Dave and I constructed the trust
22 so that all the Bitcoin and assets were taken out of my
23 control. I basically -- Dave saved my ass if I got bankrupted
24 because Bitcoin would have been -- everything I worked for my
25 whole life would have been owned by the Australian government.

1 So in 2011, what Dave helped me do was act as a front, a
2 sham as this tax office called it, to sit there and say that he
3 ran all my companies in my trust.

4 MR. FREEDMAN: Ms. Vela, can you put the email on the
5 left-hand side of the screen.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, I'm going to --

8 MR. FREEDMAN: And, no, Ms. Vela. I'm going to have
9 to ask you to pull that down because we've got to get another
10 document in evidence.

11 Can you bring up P518 just for Dr. Wright and counsel.

12 BY MR. FREEDMAN:

13 Q. Dr. Wright, do you recognize this as an email purporting to
14 be from Dave Kleiman to yourself?

15 A. No. The date's wrong. It's been altered.

16 MR. FREEDMAN: And, Your Honor, we're offering P518
17 into evidence.

18 THE COURT: Any objection?

19 MS. MCGOVERN: Objection, Your Honor. This is a
20 document that Plaintiffs are challenging as inauthentic and the
21 witness has just stated that he can't identify it because it
22 has the wrong date.

23 THE COURT: It's noted. It goes to its weight.

24 Overruled. It will be admitted into evidence.

25 (Plaintiffs' Exhibit 518 received into evidence.)

1 MR. FREEDMAN: Ms. Vela, can you take down P518.

2 Let's put back up the document Dr. Wright swore was authentic.

3 That's P035.

4 Can you highlight the date June 24th, 2011 for us,
5 please, and move it to the left side of the screen.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, I'm going to ask you again: Is this document a
8 forgery?

9 A. Again, I did not swear it was authentic. I said it was a
10 copy.

11 MS. MCGOVERN: Objection, Your Honor. Asked and
12 answered.

13 THE COURT: Overruled.

14 MR. FREEDMAN: Ms. Vela, can you please bring up P518.
15 Zoom in to the text, please, Ms. Vela, for the jury.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, this email that you produced in discovery to us
18 is almost identical to the document you swore was authentic
19 with one change.

20 MR. FREEDMAN: Ms. Vela, can you highlight the date on
21 this email that purports to come from Dave Kleiman over a year
22 after he died. Friday, 17th of October, 2014.

23 BY MR. FREEDMAN:

24 Q. Do you see that, Dr. Wright?

25 A. I see the date.

1 Q. Dr. Wright, you're aware the metadata of these documents
2 will also demonstrate you forged this document, aren't you?

3 MS. MCGOVERN: Objection, Your Honor. Predicate,
4 foundation.

5 THE COURT: Sustained.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, if this email is a forgery, then you forged an
8 email to make it look like Dave agreed that the full
9 1.1 million belonged to you, didn't you?

10 MS. MCGOVERN: Objection, Your Honor. Calls for
11 speculation. Foundation.

12 THE COURT: I'll allow it. Overruled.

13 THE WITNESS: Number one, as I stated, this was
14 submitted to the Australian government in 2012. Dave was
15 actually alive.

16 Number two, the document was not actually made into
17 the trust document and it didn't help me.

18 Number three, the transfer was from the companies and
19 the company. So none of the above.

20 BY MR. FREEDMAN:

21 Q. One last time, Dr. Wright: Did you forge this document?

22 MS. MCGOVERN: Objection. Asked and answered.

23 THE COURT: Sustained.

24 BY MR. FREEDMAN:

25 Q. All right. We'll let Dr. Edman testify to this document

1 later.

2 MR. FREEDMAN: Ms. Vela --

3 MS. MCGOVERN: Objection, Your Honor. Improper
4 transition.

5 THE COURT: Sustained.

6 MR. FREEDMAN: Ms. Vela, can you bring these documents
7 down and let's bring up P036. The second document Dr. Wright
8 swore was authentic.

9 MS. MCGOVERN: Objection, Your Honor. Move to strike
10 these statements by counsel as though they're record evidence.
11 There's not a question pending. It's inappropriate.

12 THE COURT: Sustained.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, did you swear this document was authentic?

15 A. No. I said it was a copy of the trust document.

16 Q. Swore it was an authentic copy, Dr. Wright?

17 A. An authentic copy is an authentic copy. If I copy the file
18 50 times, if I print it 50 times, if I make it to a new
19 print -- to a PDF today with today's metadata, it is an
20 authentic copy.

21 Q. Did you swear it was an authentic copy? Yes or no?

22 A. Yes.

23 Q. Dr. Wright, this purports to be a deed of trust. Do you
24 see on the top it says: "Deed of Trust"?

25 A. It is what it says.

1 Q. Purports to be a deed of trust between Wright International
2 Investments.

3 MR. FREEDMAN: Ms. Vela, can you highlight that for us
4 and zoom in on the relevant portion.

5 BY MR. FREEDMAN:

6 Q. IBC 064409?

7 A. Yes.

8 Q. IBC is International Business Company?

9 A. Yes.

10 MR. FREEDMAN: Ms. Vela, can you zoom in on -- oh, can
11 we please publish that to the jury, please. It's in evidence.

12 THE COURT: It's in evidence.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, this purports to be a deed of trust between
15 Wright International Investments, IBC number 064409, and Tulip
16 Trading, IBC number 093344. Do you see that?

17 A. I do.

18 Q. Purports to be dated 23rd of October, 2012. Do you see
19 that?

20 A. That's when it was.

21 Q. In fact, Dr. Wright, not only did you swear this was an
22 authentic copy, you also swore this document was executed in
23 October of 2012, did you not?

24 A. It would have been that day. It -- well, it's my birthday
25 so that's I think why we did it.

1 MR. FREEDMAN: Ms. Vela, let's move this document off
2 to the side and can we please bring up Joint Exhibit 14.

3 Which if it's not in evidence, Your Honor, Plaintiffs
4 would like to move it into evidence.

5 MS. MCGOVERN: No objection, Your Honor.

6 THE COURT: Without objection, 14 is admitted into
7 evidence.

8 (Joint Exhibit 14 received into evidence.)

9 BY MR. FREEDMAN:

10 Q. Can we go -- do you see where it says: "Tulip Trust,"
11 Dr. Wright?

12 A. Where am I looking? Sorry.

13 Q. Bold. Halfway down the page.

14 MR. FREEDMAN: Ms. Vela, can you highlight Tulip Trust
15 for Dr. Wright between Paragraphs 3 and 4.

16 BY MR. FREEDMAN:

17 Q. Do you see that?

18 A. I do.

19 Q. This is another sworn declaration by you, Dr. Wright, under
20 penalty of perjury?

21 A. Yes, it is.

22 MR. FREEDMAN: Ms. Vela, can you go to the next page
23 for us?

24 And in Paragraph 5, Ms. Vela, can you call that out
25 for us?

1 BY MR. FREEDMAN:

2 Q. October, 2012, a formal trust document was executed. Do
3 you see that?

4 A. Yes.

5 MR. FREEDMAN: All right. Ms. Vela, can you put down
6 Joint Exhibit 14.

7 BY MR. FREEDMAN:

8 Q. Swore it was an authentic copy. Swore it was executed in
9 October, correct?

10 A. Yes.

11 Q. The parties of this document, Dr. Wright, are Wright
12 International Investments and Tulip Trading. You see it says
13 the parties at the top?

14 A. Yes.

15 MR. FREEDMAN: Ms. Vela, can you go to the next page
16 for me?

17 BY MR. FREEDMAN:

18 Q. And here it says that -- in Paragraph 1, that the parties
19 are the beneficial owners of trust.

20 MR. FREEDMAN: Can you highlight and can you call out
21 Paragraph 1 for us, Ms. Vela.

22 BY MR. FREEDMAN:

23 Q. "That we will act as the holder and as nominee agent and
24 trustee for the parties who are at all times the beneficial
25 owners."

1 Do you see that?

2 A. The parties who are the beneficial -- it doesn't say: "The
3 parties are the beneficial owners." It says: "The parties who
4 are at all times." So ...

5 Q. The parties are the beneficial owners?

6 A. No, that's not what it says. "The parties who are the
7 beneficial owners." That doesn't mean the parties. So that's
8 actually, again, two different things.

9 MR. FREEDMAN: Ms. Vela, can you minimize that for us,
10 move it to the left side and bring up Joint Exhibit 14 again?

11 Can you go with me to paragraph 13. Can you highlight
12 Paragraph 13 for us and bring it out.

13 BY MR. FREEDMAN:

14 Q. The beneficiaries of Tulip Trust I are Wright International
15 Investments, LTD and Tulip Trading. Do you see that,
16 Dr. Wright?

17 A. I do.

18 Q. So they are the beneficiaries of this trust, are they not,
19 Dr. Wright?

20 A. Yes, but the comment on the other one wasn't what you said.

21 MR. FREEDMAN: All right. Ms. Vela, can you put down
22 Joint Exhibit 14 for us, please.

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, right below number --

25 MR. FREEDMAN: Can you highlight -- Ms. Vela, can you

1 zoom in on the -- yeah, the bottom half of that document,
2 please.

3 BY MR. FREEDMAN:

4 Q. Dr. Wright, this trust document that you swore was
5 authentic says: "Its assets to be settled in this joint
6 agreement and deed between the parties include."

7 Do you see that?

8 A. Yes, but if you scan up to the top of the document, you
9 will see what you're trying to misconstrue as the trust, the
10 cryptographic algorithmic thing that I detailed before. So you
11 are taking this out of context.

12 Q. Dr. Wright, do you see that under the assets that are
13 supposed to be in this trust you write in 3B: "This includes
14 the 1,100,111 Bitcoin under that former arrangement in the
15 attached conditions."

16 Do you see that?

17 A. Again, no. I believe if you zoom out on this, you will see
18 mention of DAC.digital or basically an algorithmic company
19 called The Trust. It will be listed above if you zoom out.

20 What you're doing is you're conflating The Trust with the
21 trust as in Tulip Trust. The Trust is the DAC distributed
22 autonomous corporation that I set up in the trust.

23 Q. Dr. Wright, Paragraph 3 says: "All Bitcoin and ledger
24 assets are going to go into this joint agreement transferred
25 into Tulip Trading by Mr. David Kleiman on June 2011 following

1 transfer to Mr. Kleiman from Dr. Wright on June 2011."

2 A. Uh-huh.

3 Q. On the 9th. So, this document is saying you sent Bitcoin
4 to Dave Kleiman. Dave Kleiman is then putting them into Tulip
5 Trading and now it's going into this trust, correct?

6 A. Into the algorithmic system, yes.

7 Q. So, Dr. Wright, this is yet another document purporting to
8 show that Dave Kleiman has no right to the 1.1 million Bitcoin
9 in the Tulip Trust, correct?

10 MS. MCGOVERN: Objection. Mischaracterizes the
11 evidence.

12 THE COURT: Sustained.

13 Rephrase.

14 BY MR. FREEDMAN:

15 Q. Dr. Wright, this is another document showing that you, your
16 companies, Tulip Trading and Wright International Investments,
17 are the sole beneficiaries of 1.1 million Bitcoin in the trust,
18 correct?

19 A. This 1.1 million was actually spent. The Tulip Trading
20 Bitcoin was purchased from a Russian exchange in 2011. The
21 records are all available. It's all in the blockchain. So
22 that Bitcoin there in Tulip Trading isn't the Wright
23 International Trading -- sorry -- Wright International, Limited
24 Bitcoin. It is another group of Bitcoin.

25 So very simply, you keep confounding the Bitcoin in one

1 company with the Bitcoin in another company. And you keep
2 saying "mined," but this is not mined by me. This is purchased
3 by me.

4 Tulip Trading, Limited transferred control so that we could
5 spend it. This was not outside my control. This was not ones
6 I couldn't spend.

7 Q. Let's just summarize this for a moment, Dr. Wright. Dave
8 Kleiman dies in 2013, correct?

9 A. Yes.

10 Q. We saw you swore the Tulip Trust document was executed in
11 2012, correct?

12 A. Yes.

13 Q. And, in fact, it's dated from 2012, correct?

14 A. Yes.

15 Q. And now we've seen that this Tulip Trust was created by
16 Tulip Trading and Wright International Investments, correct?

17 A. Again, what you're confounding is the bit you're hiding and
18 not showing, which is The Trust. You will find in this
19 document, if you actually zoomed out and showed the full
20 document rather than not letting me see it, that it involves
21 The Trust, a DAC. A DAC being a distributed autonomous
22 corporation.

23 That is now a big thing with Ethereum and all these other
24 crypto, like how do we make a company that can operate
25 autonomously. So that's actually in here.

1 MR. FREEDMAN: Ms. Vela, zoom out for Dr. Wright.

2 BY MR. FREEDMAN:

3 Q. What am I hiding, Dr. Wright?

4 A. If you go up to line 2 -- line 3. Please highlight them
5 and expand. "We will undertake to agree and act in the process
6 known as The Trust." I said that multiple times.

7 Being a DAC distributed autonomous corporation, formed
8 using a split-key cryptographic process, which I said that the
9 SSIs have voting power through the DAC and the software-based
10 provisions formulated and the distribution of keys will be
11 held.

12 The entire thing that I've been saying I set up inside my
13 trust, a DAC, a distributed autonomous corporation. The first
14 one in human history. That's it.

15 Q. Dr. Wright, I'm not quibbling with you about the form of
16 the trust --

17 MS. MCGOVERN: I can't hear the question.

18 BY MR. FREEDMAN:

19 Q. I said I'm not disputing with you the form of the trust.
20 I'm talking about what you put into the trust.

21 A. No, you are, because you are confounding --

22 Q. Dr. Wright, there's no question pending.

23 MR. FREEDMAN: Ms. Vela, can you please go down to the
24 highlighted question. The highlighted part of this document.

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, this document says: "The assets to be settled
3 in this joint agreement and deed between the parties include
4 the 1,100,111 Bitcoin held under a former arrangement and the
5 attached conditions"; isn't that true?

6 MS. MCGOVERN: Objection, Your Honor. The document
7 speaks for itself and it's argumentative.

8 THE COURT: Sustained.

9 BY MR. FREEDMAN:

10 Q. Dr. Wright, I want to go through these things in order so
11 it's easy to follow. Dave Kleiman dies in 2013, correct?

12 A. Correct.

13 Q. This document was executed in 2012, correct?

14 A. Executed and issued as copied to the Australian government.
15 Same month.

16 MR. FREEDMAN: Ms. Vela, can you bring us to Page 1?

17 BY MR. FREEDMAN:

18 Q. It was formed between Wright International Investments and
19 Tulip Trading, IBC number 093344 on 23rd October 2012, correct?

20 A. Correct.

21 Q. Dr. Wright, isn't it true that you had no connection
22 whatsoever to Tulip Trading until two years after this trust
23 document was executed?

24 A. No. Actually, the company was audited and was part of a
25 court case. It went into '12, '13 and then '14. So, you're

1 going to bring up the fact that some of my staff tried to get
2 me in trouble with the tax office again. And you're going to
3 ignore the fact that it's mentioned earlier again. So no.

4 Q. Dr. Wright, isn't that because you bought Tulip Trading II
5 years after this trust document was allegedly executed?

6 MS. MCGOVERN: Objection, Your Honor. Lack of
7 predicate.

8 THE COURT: Overruled.

9 THE WITNESS: No.

10 BY MR. FREEDMAN:

11 Q. And, Dr. Wright, isn't it true that you purposely looked
12 for and bought an aged shelf company so that in 2014 you could
13 make it look like you had entered into a trust agreement in
14 2012, the year before Dave Kleiman died?

15 A. Seeing as though I already had an aged company called
16 Wright International Investments, that would be really silly.
17 No.

18 MR. FREEDMAN: Ms. Vela, can you please put this down
19 for a moment and bring up P522 for just counsel and the
20 witness.

21 Q. Dr. Wright, do you recognize this as an email exchange
22 between Denis Mayaka and yourself?

23 A. I recognize it as a known compromised email that happened,
24 yes.

25 MR. FREEDMAN: Ms. Vela, can you go to Page 3, please.

1 BY MR. FREEDMAN:

2 Q. Do you see the name Tulip Trading, Limited, Dr. Wright?

3 A. I do.

4 MR. FREEDMAN: Your Honor, Plaintiffs offer P522 into
5 evidence.

6 MS. MCGOVERN: No objection, Your Honor.

7 THE COURT: Admitted into evidence.

8 (Plaintiffs' Exhibit 522 received into evidence.)

9 MR. FREEDMAN: Can we publish to the jury.

10 And go with the last page. That's the first email,
11 last page, Page 3.

12 BY MR. FREEDMAN:

13 Q. Dr. Wright, the very first email in this chain comes from
14 somebody named Denis -- Denis Mayaka?

15 MR. FREEDMAN: No. No. Ms. Vela, please zoom back
16 out. Zoom into the bottom half, please.

17 BY MR. FREEDMAN:

18 Q. Dr. Wright, Denis Mayaka, do you see his signature at the
19 bottom?

20 A. That's not his email.

21 Q. Do you see: "Denis Mayaka" at the bottom?

22 A. I see: "Denis Mayaka" against a thing that isn't Denis's
23 email, yes.

24 Q. And, Dr. Wright, the title of the email is: Aged Shelf
25 Company," correct?

1 A. Yes.

2 Q. "Dear Craig: We trust you are well. We received your
3 message requesting an aged shelf company."

4 Do you see that?

5 A. I do.

6 Q. This is -- this email comes from Denis Mayaka on October
7 16th, 2014. Do you see that?

8 A. No, because it's not his email. So if it's not his email,
9 it doesn't come from him. Anyone can type someone's name.

10 Q. I understand you contend it's not his email. You'll have
11 an opportunity to try to prove that later. Okay? Right now,
12 I'd like you to focus on my questions.

13 "We received your message requesting an aged shelf
14 company."

15 Do you see that?

16 A. I see that line.

17 Q. "Please find attached list of our shelf companies."

18 Do you see that?

19 A. I do.

20 Q. "Kindly let us know which company you would like to take."

21 Do you see that?

22 A. I do.

23 Q. Additionally, once you identify the company, please fill
24 out the attached form and email it back to us. Do you see
25 that?

1 A. I also do.

2 MR. FREEDMAN: Ms. Vela, can you please just scroll up
3 to the next message.

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, you respond back that same day. You say you
6 want Tulip Trading, Limited. This is October 16th, 2014. Do
7 you see that?

8 A. I see the line but, no, I didn't respond.

9 Q. And the formation date for the aged shelf company since
10 it's aged, Dr. Wright, is July 21st, 2011. Do you see that?

11 A. I see the subject.

12 Q. And the IBC number for Tulip Trading, Dr. Wright, we've
13 seen that number before, is 093344, right?

14 A. I see that number, yes.

15 Q. Same number on the trust document you swore is authentic,
16 right?

17 A. The same trust document that went to the Australian Tax
18 Office in 2012, yes.

19 Q. Are you saying you submitted a forged document to them too?

20 MS. MCGOVERN: Objection, Your Honor. Misstates the
21 testimony.

22 THE COURT: Sustained.

23 MR. FREEDMAN: Ms. Vela, can you scroll up to the next
24 email in the chain. Little higher.

1 BY MR. FREEDMAN:

2 Q. And, Dr. Wright, Denis Mayaka responded still that same
3 day. He says: "Dear Craig: One-off fees of US dollars,
4 \$1,850. Annual fees from second year onwards \$600. Does that
5 work for you?"

6 Do you see that?

7 A. I can see that that would be an extreme discount.
8 Everything to do with Dennis's companies cost a lot more than
9 that, so that's wrong.

10 Q. You're right, Dr. Wright. You do end up paying a lot more
11 than that. Let's see what happens.

12 MS. MCGOVERN: Objection, Your Honor. These
13 statements are not statements and they're gratuitous and
14 inappropriate.

15 THE COURT: Overruled at this point. Let's continue.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, you next respond. You say: "Yes. Please
18 reserve it. How do I pay?"

19 Do you see that?

20 A. I see the line.

21 MR. FREEDMAN: Can you scroll up again, Ms. Vela.

22 BY MR. FREEDMAN:

23 Q. Mr. Mayaka responds back. He says: "Dear Craig, thanks.
24 The company has been reserved for you. Please fill out the
25 attached form and email a signed copy. I've attached our bank

1 account details for your reference. Kindly email us SWIFT
2 payment details once available. I'm available on Skype,
3 telephone call to complete the form together if you need my
4 help. Please see my contact details on my email signature
5 below. I look forward to hearing from you. Regards, Denis."

6 Do you see that.

7 A. I can see it.

8 MR. FREEDMAN: Ms. Vela, can you scroll up again,
9 please.

10 BY MR. FREEDMAN:

11 Q. You respond back. We're now on October 17th, 2014.
12 "Sorry. I cannot see the bank details listed. Also please
13 confirm three years at \$600 plus \$1,850 for a total of \$3,650."

14 Do you see that?

15 A. Yes. I see this would have been a real discount on a shelf
16 company.

17 MR. FREEDMAN: Keep going up please, Ms. Vela.

18 BY MR. FREEDMAN:

19 Q. October 17th, 2014 Denis Mayaka responds: "Dear Craig,
20 please find attached invoice and bank details. Please email us
21 SWIFT details once available. Best regards, Denis."

22 MR. FREEDMAN: Can you go up again, Ms. Vela, please.

23 BY MR. FREEDMAN:

24 Q. Top email now, Dr. Wright, October 17th, 2014. You respond
25 back to Denis Mayaka: "Hello. Due to the limits on the

1 account for new international transfers, this will be completed
2 in parts. It is too late to have the bank increase the limit
3 before Monday. Sorry. Payment one is attached, US dollars
4 \$1,650. Payment two is scheduled for midnight tonight, US
5 \$1,500. Payment three is scheduled for midnight tomorrow, US
6 dollars \$1500. Invoice two will process on Monday. Regards,
7 Craig."

8 Do you see that, Dr. Wright?

9 A. I do.

10 Q. Arranging for payment with Denis Mayaka, right?

11 A. Wrong.

12 Q. Dr. Wright, I'm going to switch us to another version of
13 this email chain that contains some of the attachments that we
14 were just referencing before.

15 MR. FREEDMAN: Ms. Vela, can you bring up P523 just to
16 counsel and the witness.

17 BY MR. FREEDMAN:

18 Q. You see it's called, subject, "Payment"? You're listed as
19 the organizer?

20 A. Yes. I don't recognize this. Sorry.

21 MR. FREEDMAN: Ms. Vela, can you zoom out, please, and
22 go to the next page.

23 BY MR. FREEDMAN:

24 Q. You see this is the same email we've -- an email between
25 you and Denis again talking about shareholders?

1 A. Also don't recognize it.

2 MR. FREEDMAN: Okay. Ms. Vela, can you go to the next
3 page, please.

4 See an invoice here. Ms. Vela, can you highlight the
5 company details for the invoice.

6 BY MR. FREEDMAN:

7 Q. You see that? You recognize that name, Tulip Trading,
8 Limited?

9 A. Yes, and I notice that it's a different amount to the one
10 that was before. It doesn't -- it's not the nominee of \$600.
11 It is not a share so this is a different document.

12 MR. FREEDMAN: Ms. Vela, can you go to the next page
13 please.

14 BY MR. FREEDMAN:

15 Q. You see again this email chain that we were looking at
16 before? Denis Mayaka telling you he's going to send you an
17 invoice and bank account details? We looked at this email
18 already. Do you see that, Dr. Wright?

19 A. Yes. I see two different amounts. In the last one, it was
20 \$2,000 for shareholder services and this one it's \$3,650, and
21 it's completely different. Yes.

22 Q. One for shareholder services, one for buying the company,
23 Dr. Wright.

24 MR. FREEDMAN: Ms. Vela, can you bring us to the next
25 page.

1 And the next page?

2 BY MR. FREEDMAN:

3 Q. There we go, Dr. Wright, \$3,650. Do you see that?

4 A. I do. I don't recognize this document.

5 MR. FREEDMAN: All right. At this point, Your Honor,
6 Plaintiffs offer P523 in evidence.

7 MS. MCGOVERN: Object, Your Honor. Authentication.
8 The witness has not identified the document.

9 THE COURT: Overruled. I'll allow it. Admitted into
10 evidence.

11 (Plaintiffs' Exhibit 523 received into evidence.)

12 MR. FREEDMAN: Ms. Vela, can you bring us to Page 9.

13 BY MR. FREEDMAN:

14 Q. Here, Dr. Wright, you'll see the emails we just looked at
15 between you and Denis Mayaka.

16 MR. FREEDMAN: Ms. Vela, can you zoom in to the top
17 half of the emails.

18 BY MR. FREEDMAN:

19 Q. Again, we've seen these emails, Dr. Wright. Company's been
20 reserved for you, he gives you the price, he tells you the
21 SWIFT details. You tell him: "I'm going to pay on a
22 schedule," right?

23 A. No, I don't pay on schedules. My international transfer
24 rate back then was \$250,000 on a new client. And 20 million
25 without authorization. I've got a Black credit card. My

1 theoretical limit is 150 million, so I don't make
2 thousand-dollar payments. Sorry.

3 Q. Let's just look at what the documents say. Okay? Please,
4 Dr. Wright.

5 MR. FREEDMAN: If we go to Page 12, Ms. Vela.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, do you see this is a transfer receipt? Top
8 left corner.

9 A. I do. I see that's what it purports to be.

10 MR. FREEDMAN: Ms. Vela, can you zoom out a little
11 bit, please.

12 No. Zoom out.

13 There we go.

14 BY MR. FREEDMAN:

15 Q. Okay. It's from Commonwealth Bank, Dr. Wright. Do you see
16 that in the top left corner?

17 A. I see that there's a logo there, yes.

18 Q. Transfer receipt, the date is 17th of October, 2014. Do
19 you see that?

20 A. I see the date.

21 Q. US dollars, \$1,650, sent to Abacus Seychelles, Limited. Do
22 you see that?

23 A. I see that.

24 Q. There's a receipt number. Do you see that?

25 A. I do.

1 Q. You're transferring to Abacus Seychelles, Limited. Do you
2 see that?

3 A. Technically, their New York address there, and they're not
4 in New York. So that's erroneous.

5 Q. And "My Transfer Details," Dr. Wright, at the bottom, do
6 you see where it says: "Transfer from DeMorgan"?

7 A. No, it says: "DeMorgan" -- "DeMorgan Expenses," and that's
8 wrong.

9 Q. And it says you sent \$1,650 US dollars. Do you see that?

10 A. No, it doesn't say that I sent that.

11 MR. FREEDMAN: Ms. Vela, can you highlight the top
12 line in transfer details.

13 BY MR. FREEDMAN:

14 Q. That literally says you sent \$1,650 US dollars.

15 A. It doesn't say that I sent it. The line reads: "You
16 sent," but it doesn't say from me.

17 Q. Okay. And do you see in the additional details it says:
18 "Reason for transfer, message for recipient Invoice 393888?"

19 MR. FREEDMAN: Ms. Vela, can you highlight -- can you
20 bring that up for us so we can see it easily.

21 BY MR. FREEDMAN:

22 Q. Do you see that, Dr. Wright?

23 A. I do.

24 Q. This is your payment transfer, is it not?

25 A. No, it is not.

1 MR. FREEDMAN: All right. Ms. Vela, can you please
2 bring up the Invoice 393888 which is on Page 6 of this PDF.

3 Ms. Vela, can you highlight invoice number 393888
4 right above the line on the left-hand side.

5 BY MR. FREEDMAN:

6 Q. And, Dr. Wright, there's your invoice for \$3,650 perfectly
7 matching the amount, correct?

8 A. No. Because that's -- you can't match something that's not
9 the other document. The other document isn't a payment from --
10 transferred from my bank account. My bank account required two
11 of three signatories who were directors. None of that's
12 listed. That's not a Commonwealth Bank transfer statement. It
13 might be a piece of paper but it's not a transfer statement.
14 So, no, that doesn't match.

15 Q. You'll have an opportunity to prove that when your lawyers
16 talk to you, Dr. Wright. For now, let's focus on the
17 documents. Okay?

18 A. Well, you want me to match things -- and you're saying --
19 but they're not.

20 Q. Dr. Wright, the invoice is issued by Abacus Seychelles.
21 Top right corner's got their logo. Do you see that?

22 A. I don't know if that's their logo.

23 Q. "Company details, Tulip Trading, Limited."

24 Do you see that?

25 A. I do.

1 Q. "Date -- "Invoice date, October 17th, 2014." Do you see
2 that?

3 A. Yes, I do.

4 Q. Purchase of Seychelles 2011 shelf company. Do you see
5 that?

6 A. I do.

7 Q. So, Dr. Wright, you purchased Tulip Trading on
8 October 17th, 2014, did you not?

9 A. No. And nor could I. As I said, the corporate accounts
10 for DeMorgan were run by the CFO and had to be signed off as a
11 separate process. All of the accounts went through on two
12 monthly payments, one on the 15th, one on the 30th, unless it
13 was like a 28th.

14 They were put through by Ali Lodi who was the accountant,
15 and then signed off by John Chesher on the first thing. Once
16 they went through there, it had to be then cosigned by either
17 Ramona, my wife, myself, or Ellen Granger, who was the audit
18 head committee. The person who would sign it on the document
19 would be listed and the cosigner would be listed.

20 We -- that wouldn't be shared because we all had biometric
21 thumbprint things that recorded our name. So, all of our
22 transaction things were recorded and had the little one-time
23 tokeny things. So I can categorically say that is not a
24 transfer from our documents or our company. Sorry.

25 Q. Dr. Wright, you purchased Tulip Trading on October 17th,

1 2014, two years after you claim it created the Tulip Trust to
2 hold the 1.1 million Bitcoin you now claim Dave has no right
3 to; isn't that correct?

4 A. Multiple questions again. One, Tulip Trading was put into
5 evidence in a court case in Australia in 2012.

6 Two, the purchase of Bitcoin was made to Tulip Trading from
7 a Russian exchange in 2011. It wasn't mined. That was
8 documented.

9 Three, the purchase that you're talking about here would be
10 after the already-existing company had been part of the audits
11 that you're talking about and, thus, if they're already part of
12 a tax audit, what you're saying, that I've been in a tax audit
13 for a year using this company that now this document comes up.
14 So ...

15 Q. One more thing, Dr. Wright. We've seen that date, October
16 17th, 2014, before, haven't we?

17 A. I've seen October 17th in many correspondences in my life,
18 yes.

19 MR. FREEDMAN: Ms. Vela, can you put the purchase of
20 Tulip Trading on the left-hand side on October 17th, 2014. And
21 can you please bring up P518 which is the draft forgery of Dave
22 Kleiman's email.

23 MS. MCGOVERN: Objection, Your Honor.
24 Mischaracterizes the record.

25 MR. FREEDMAN: They're both in evidence.

1 THE COURT: All right. The objection is sustained.
2 If you'll identify it.

3 MR. FREEDMAN: P518.

4 THE COURT: 518.

5 MR. FREEDMAN: It's in evidence.

6 THE COURT: Yeah, 518 is in evidence, the email.

7 There are other parts of 518 but that is in evidence.

8 MR. FREEDMAN: Ms. Vela, can you highlight the date
9 for me.

10 BY MR. FREEDMAN:

11 Q. Dr. Wright, October 17th, 2014 is the same date that
12 appears in the draft email you forge from Dave Kleiman to make
13 it look like he agreed to the trust in 2011; isn't that
14 correct?

15 A. Not at all. And very simply, if no transfer went through,
16 then everything stays in Wright International. So all you're
17 doing is saying no transfer went from Wright International into
18 Tulip Trading.

19 So, my company into my company. And your argument is I
20 defrauded someone by leaving it in one of my companies or
21 moving it to one of my companies from one of my companies. Not
22 to Dave, my company.

23 Q. October 17th, 2014 was a pretty busy day for you,
24 Dr. Wright, was it not?

25 A. No. Actually, it wasn't.

1 Q. Truth is, Dr. Wright, you forged both versions of the Tulip
2 Trust we just looked at in order to make it seem like Dave
3 Kleiman signed off on you owning the full 1.1 million Bitcoin
4 that you both mined in partnership as Satoshi Nakamoto; isn't
5 that correct?

6 MS. MCGOVERN: Objection, Your Honor. Asked and
7 answered multiple times.

8 THE COURT: Overruled.

9 THE WITNESS: Again, this is Tulip Trading. Tulip
10 Trading listed as purchasing Bitcoin in 2011. I purchased them
11 from a Russian exchange. They were dodgy, I know. But
12 everyone was dodgy in 2011 to do with the Bitcoin world. I
13 used Liberty Reserve funds from my gaming operations. I know
14 your government doesn't like gambling.

15 I'm not American. I transferred that money that I
16 owned in Costa Rica and Panama and other places. And yes, I
17 know your government doesn't like poker. I do. I transferred
18 that to pay for things and that was then put into my company
19 from my company.

20 So the simple answer here is the Bitcoin you're trying
21 to say are mined have nothing to do with Bitcoin I mined in
22 2009.

23 The simple thing is you're trying to say one million
24 Bitcoin, Satoshi, everyone knows. Wrong. There were one
25 million Bitcoin or so, a little bit less, and plus remainders

that I mined and there were one million that I bought and there's extra on top of that. So, you're wrong, wrong, and incorrect.

BY MR. FREEDMAN:

Q. Dr. Wright, Tulip Trading could not have signed a trust deed in 2012 as relates to your Bitcoin because you didn't own it until 2014, correct?

A. Absolutely wrong still.

MR. FREEDMAN: Thank you, Ms. Vela. You can take those down.

BY MR. FREEDMAN:

Q. Dr. Wright, isn't it true that after Dave's death you took actual control over all 1.1 million Bitcoin?

A. Again, you're talking about the Bitcoin that I purchased -- if you're doing that one at that stage, that I purchased using my money from my companies in 2011 and that I put into basically a thing to make sure the government couldn't touch it. The reason I did this was very simple. My lawyer at the time, Andrew Sommer, alerted me, saying that with the court case I had been fighting since 2009, the tax office had issued bankruptcy proceedings. Bankruptcy proceedings that would have effectively put an administrator over my estate, meaning that the court case I later won would have been closed.

The dirty tactics that the damn government in Australia did was to try and close my company -- stop my court case before I

1 won it. The way they wanted to stop my court case was
2 basically to screw me over by bankrupting me, which they didn't
3 get to do. I won. And basically I had Dave help me ensure
4 that nothing was in my control so that they couldn't bankrupt
5 me. That's the real story.

6 Q. Dr. Wright, within months of Dave's death, you told a
7 prospective counter-party for a business transaction that your
8 companies controlled a little over 1 million Bitcoin, did you
9 not?

10 A. At one stage, they controlled over one million Bitcoin.
11 That was again talking about Tulip Trading. We did not discuss
12 anything to do with the 800-something thousand in Wright. We
13 didn't discuss any other rights we owned.

14 We talked about one thing for one company and that was
15 discussed before Dave died, as well as when people asked on
16 that particular area afterwards.

17 MR. FREEDMAN: Ms. Vela, can you please bring up P091
18 for the witness and counsel.

19 BY MR. FREEDMAN:

20 Q. Dr. Wright, do you recognize this as an email between
21 yourself and Roger Manu describing the amount of Bitcoin you
22 controlled?

23 A. Again, no. We're talking about the Bitcoin in a particular
24 company.

25 MR. FREEDMAN: Plaintiffs offer P091 into evidence,

1 Your Honor.

2 THE COURT: Any objection?

3 MS. MCGOVERN: No objection, Your Honor.

4 THE COURT: Admitted into evidence.

5 (Plaintiffs' Exhibit 091 received into evidence.)

6 MR. FREEDMAN: Can we publish to the jury, please?

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, we're looking at an email from yourself to
9 Roger Manu, a company called Rubik. The date is September
10 23rd, 2013. We're about five months after Dave dies, correct?

11 A. It's about that time frame, yes.

12 MR. FREEDMAN: Ms. Vela, can you highlight: "We
13 control what is all up a little over 1 million Bitcoin."

14 THE WITNESS: Is that a question?

15 MR. FREEDMAN: Just waiting for the highlight,
16 Dr. Wright.

17 BY MR. FREEDMAN:

18 Q. Do you see that, Dr. Wright?

19 A. I see that, yes.

20 Q. In fact, Dr. Wright --

21 MR. FREEDMAN: Thank you, Ms. Vela. You can take that
22 down.

23 BY MR. FREEDMAN:

24 Q. In fact, Dr. Wright, you told the Australian government
25 that you obtained Dave's Bitcoin after he died, did you not?

1 A. No, I did not.

2 MR. FREEDMAN: Ms. Vela, can you please bring up P633
3 for just the witness and opposing counsel?

4 I don't know if this is in evidence. Is P633 in
5 evidence? P633.

6 BY MR. FREEDMAN:

7 Q. In the meantime, Dr. Wright, do you see it's an email from
8 yourself to Michael Hardy at the Australian Tax Office with a
9 cc to your wife? In it, you discuss Bitcoin addresses and Dave
10 Kleiman himself. Do you see that?

11 A. It's a cc to Jamie Wilson and my wife.

12 Q. Do you see that, Dr. Wright?

13 A. I see that it is, yes.

14 MR. FREEDMAN: Plaintiffs' offer P633 into evidence,
15 Your Honor.

16 MS. MCGOVERN: No objection, Your Honor.

17 THE COURT: Admitted into evidence.

18 (Plaintiffs Exhibit 633 received into evidence.)

19 BY MR. FREEDMAN:

20 Q. Dr. Wright, do you see a list of Bitcoin addresses?

21 A. I do.

22 Q. You see the total down there, 416,000, then the bunch of
23 other totals below that?

24 A. I do.

25 MR. FREEDMAN: Ms. Vela, can you please highlight the

1 portion of the email where Dr. Wright tells the Australian Tax
2 Office: "The addresses are in my control now as a matter of
3 fate and other circumstances. David Reese and David Kleiman
4 have both been essential parts of this project."

5 BY MR. FREEDMAN:

6 Q. Do you see that?

7 A. I do.

8 Q. Dr. Wright, when you said: "These addresses are now in my
9 control as a matter of fate and other circumstances," you meant
10 because Dave died, did you not?

11 A. No, I did not.

12 MR. FREEDMAN: Ms. Vela, can you please play clip 44
13 from Dr. Wright's March 18th, 2020 deposition.

14 (Video played.)

15 BY MR. FREEDMAN:

16 Q. Dr. Wright --

17 MR. FREEDMAN: Ms. Vela, can you please bring up P633
18 again?

19 This is in evidence. Thank you.

20 And highlight: "These addresses are in my control now
21 as a matter of fate and other circumstances. David Reese and
22 Dave Kleiman were both essential parts of this project. Dave
23 Kleiman was my best friend."

24 Thank you, Ms. Vela.

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, you conveyed to the ATO that you picked up
3 Bitcoin ownership from Dave Kleiman, did you not?

4 A. No. Actually I came nowhere close to doing anything like
5 that.

6 MR. FREEDMAN: Ms. Vela, can you please bring up P127.
7 And can we go to Page 31?

8 I believe P127 is in evidence.

9 MS. MCGOVERN: It is.

10 MR. FREEDMAN: Can we publish to the jury, please.

11 And, Ms. Vela, can you zoom in on 1 through 15 or so.

12 Okay. That works.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, this is Mr. Dolevski from the Australian
15 Taxation Office talking. He says: "We thought" --

16 MR. FREEDMAN: Ms. Vela, can you highlight from there.

17 BY MR. FREEDMAN:

18 Q. "We thought" --

19 MR. FREEDMAN: Three lines up from the bottom.

20 BY MR. FREEDMAN:

21 Q. "We thought, yes, you have picked up some Bitcoin ownership
22 from the deceased director. So we are trying to, you know, get
23 the picture and connect all the dots."

24 Do you see that?

25 A. I see another document that you're purporting to be a

1 document from the ATO that isn't. Yes. And, no, he didn't say
2 that.

3 MR. FREEDMAN: Thank you, Ms. Vela. You can put that
4 down.

5 BY MR. FREEDMAN:

6 Q. Dr. Wright, after you assumed control of Dave Kleiman's
7 share of the Bitcoin and forged trust documents, you took other
8 steps to protect the assets you took; isn't that correct?

9 MS. MCGOVERN: Objection, Your Honor.

10 Mischaracterizes the evidence in the record.

11 THE COURT: Sustained.

12 BY MR. FREEDMAN:

13 Q. Dr. Wright, you took other steps to protect assets. Is
14 that not correct?

15 A. I've taken steps to protect my family's assets all through
16 my life right back from the 90s protecting my mother's assets,
17 protecting my sister's assets, so yes, I protect my family's
18 assets.

19 Q. And you purposely made sure they weren't a trustee of these
20 trusts because then people could force you to move coins and
21 could seize assets from you; isn't that correct?

22 A. That is incorrect in so many ways.

23 MR. FREEDMAN: Your Honor, we're seeking to impeach
24 Dr. Wright with an exhibit that again is an impeachment-only
25 exhibit and it's a video.

1 MS. MCGOVERN: Citation?

2 MR. FREEDMAN: It's a video. It's an impeachment
3 exhibit.

4 MS. MCGOVERN: Can we see if it's proper impeachment,
5 Mr. Freedman? Hasn't been proper impeachment along the way.

6 MR. FREEDMAN: The Court's rules don't require --

7 MS. MCGOVERN: We would --

8 MR. FREEDMAN: The Court's rules don't require listing
9 of impeachment exhibits.

10 MS. MCGOVERN: If, in fact --

11 THE COURT: All right. In fairness, why don't you
12 provide Ms. McGovern the page and line before you play it to
13 the jury.

14 MR. FREEDMAN: It's a YouTube video, Your Honor.

15 THE COURT: All right. Do you have the number?

16 MR. FREEDMAN: It's a YouTube video.

17 THE COURT: And Ms. McGovern hasn't seen it?

18 MR. FREEDMAN: It's an impeachment exhibit. The Court
19 doesn't require disclosure of those exhibits, Your Honor.

20 MS. MCGOVERN: That's a position that's different
21 than --

22 THE COURT: Do you have a date for her, so at least
23 she --

24 MR. FREEDMAN: It's January 23rd, 2020, a
25 Cointelegraph Interview with Dr. Craig Wright.

1 MS. MCGOVERN: Your Honor, it's -- we would like to
2 have an opportunity to look at this impeachment, particularly
3 because we may have other objections. I thought this was a
4 deposition clip so it's a completely different issue, Your
5 Honor. We could have time to take a look at it and bring that
6 up tomorrow morning.

7 THE COURT: I agree. I agree. We're not going to
8 conclude tonight so let's move to another topic and you can
9 review that this evening.

10 MR. FREEDMAN: Your Honor, I can show Ms. McGovern the
11 exact script text of what we're going to play.

12 THE COURT: All right.

13 MS. MCGOVERN: I'd like to see the YouTube video, Your
14 Honor, for purposes of prejudice and others. Just looking at
15 the text is not sufficient, Your Honor. I'd like an
16 opportunity to review.

17 THE COURT: If it's Dr. Wright on the video, then I
18 think it is the text that is important.

19 MS. MCGOVERN: I'm just saying we haven't seen it so
20 to the extent --

21 THE COURT: I understand.

22 MS. MCGOVERN: -- if it's over-inclusive.

23 (Pause in proceedings.)

24 MS. MCGOVERN: Your Honor, this is out of context. We
25 object to the use of it. It's unduly prejudicial. It's being

1 used for a purpose we don't believe is proper, Your Honor.

2 We'd like an opportunity to address this with the Court.

3 THE COURT: All right. For purposes of the Rule of
4 Completeness, if it is being taken out of context, I am going
5 to give Ms. McGovern an opportunity to review it and let's move
6 on. You certainly will have the opportunity tomorrow.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, you have claimed now to have more money than
9 the country of Rwanda; is that not true?

10 MS. MCGOVERN: Objection, Your Honor. Unduly
11 prejudicial. Relevance.

12 THE COURT: Overruled. You may answer the question.

13 THE WITNESS: I was sitting in a group of African
14 countries trying to help them actually create digital money for
15 their people. And I got angry when a whole lot of people from
16 EOS and other things basically did a whole pump-and-dump scam
17 on them. And those people in those countries ended up losing
18 money. So yes, when I was angry, I actually said that.

19 BY MR. FREEDMAN:

20 Q. And do you have more country -- you have more money than
21 the country of Rwanda, correct?

22 A. Yes.

23 Q. And, Dr. Wright, you claim to be a multi-billionaire now;
24 is that not correct?

25 MS. MCGOVERN: Objection, Your Honor. Relevance.

1 THE COURT: Sustained.

2 MR. FREEDMAN: Your Honor, can we approach for a
3 moment?

4 MS. MCGOVERN: Your Honor, can we take this up --

5 THE COURT: Why don't we take it up in five minutes
6 when we're going to adjourn for the day.

7 MS. MCGOVERN: Thank you.

8 MR. FREEDMAN: Then I have no more questions for
9 today, Your Honor.

10 THE COURT: There isn't another area that you could
11 move to, or have you concluded your direct examination with the
12 exception of the video and this issue?

13 MR. FREEDMAN: I could move forward, Your Honor, and
14 I'm happy to, but I would stop in the middle of a section. If
15 you want me to go forward, I will.

16 THE COURT: We have five minutes. Could we just start
17 and ...

18 BY MR. FREEDMAN:

19 Q. Okay. Dr. Wright, you were in touch with Robert MacGregor
20 in early 2016?

21 A. At different points, yes.

22 Q. And Robert MacGregor wanted you to come out as Satoshi; is
23 that correct?

24 A. He wanted to script a media outing, yes.

25 Q. Did Robert MacGregor want you to come out as Satoshi

1 Nakamoto?

2 A. I can't speak for Robert MacGregor.

3 MR. FREEDMAN: Ms. Vela, can you please play clip 992
4 of Dr. Wright's deposition from March 16th, 2020?

5 (Video played.)

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, specifically, Robert MacGregor hired PR
8 consultants to help coordinate press events to facilitate you
9 coming out as Satoshi Nakamoto; am I correct?

10 MS. MCGOVERN: Objection. Foundation. Lack of
11 predicate, Your Honor.

12 THE COURT: Overruled.

13 THE WITNESS: I don't actually know. I know I got
14 really angry with Robert MacGregor. I know he did a whole lot
15 of things I didn't like. I know there were PR people hired. I
16 know that media things were done. I do not know all of the
17 details.

18 I know that a lot of people scripted my life at the
19 time and I know that while I was in different countries
20 doing -- like working, people planned things I didn't want
21 because I allowed things to get out of control.

22 MR. FREEDMAN: Ms. Vela, can you play please clip
23 number 93 from Dr. Wright's deposition.

24 (Video played.)

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, Robert MacGregor wanted this media plan so he
3 could quickly sell off nChain, correct?

4 MS. MCGOVERN: Objection.

5 THE COURT: The basis?

6 MS. MCGOVERN: Predicate, Your Honor. Lack of
7 foundation. There's nothing in the record.

8 THE COURT: Overruled. If the witness knows.

9 THE WITNESS: As I said, I don't know whether it was
10 really Robert MacGregor. Robert MacGregor and I rub the wrong
11 way is what -- I mean, he makes me particularly angry. We
12 don't get on at all. He -- he's worse than you in those
13 depositions with me.

14 I really -- I'm trying to say it without sounding
15 Australian and swearing. Let's just say I really don't like
16 MacGregor and I probably blamed him more than he should be
17 blamed.

18 BY MR. FREEDMAN:

19 Q. Did he want a media plan to sell off nChain?

20 A. I actually don't know. I don't know if it was him or
21 others behind him.

22 Q. All right. Dr Wright, do you recall Nick Caley being one
23 of the people being employed for The Outside Organisation of
24 those PR events of you coming out as Satoshi Nakamoto?

25 A. That isn't an exact characterization. Nick was -- I don't

1 know how Nick was involved. I don't know if it was actually
2 working for them, or consulting or -- so I don't really know.

3 MR. FREEDMAN: Ms. Vela, can you please bring up P630
4 for just the witness and counsel.

5 BY MR. FREEDMAN:

6 Q. Dr. Wright, you see this is an email from yourself
7 commenting on an email from Victoria Brooks?

8 MR. FREEDMAN: And, Ms. Vela, can you bring us down to
9 Page 4.

10 THE WITNESS: I don't actually see that it's from me.
11 It says: "NChain Craig," but that doesn't mean --

12 MS. MCGOVERN: Objection. The exhibit is not in
13 evidence at this point.

14 MR. FREEDMAN: It is not.

15 MS. MCGOVERN: Object to the use -- to the reference
16 of the substantive nature of it until it is.

17 THE COURT: I don't think there was a question
18 pending. It was a gratuitous comment by the witness.

19 MS. MCGOVERN: I agree. I agree.

20 THE COURT: All right.

21 MR. FREEDMAN: Ms. Vela, can you highlight the first
22 name that appears after the word contacts.

23 All the way down. Thank you.

24 BY MR. FREEDMAN:

25 Q. Dr. Wright, does that refresh your recollection that Nick

1 Caley was a media consultant with The Outside Organisation?

2 A. No, because nChain Craig isn't -- that's not my email. So
3 there are other Craigs, but that's not mine. I don't recognize
4 it.

5 MR. FREEDMAN: Okay. Ms. Vela, can you please bring
6 up P236.

7 BY MR. FREEDMAN:

8 Q. And, Dr. Wright, do you recognize this as again another
9 email between you and Victoria Brooks including Nick Caley from
10 The Outside Organisation?

11 A. I don't.

12 Q. And you are discussing Satoshi in these emails. Do you see
13 that?

14 A. I don't recognize this email.

15 THE COURT: This was withdrawn. Is this a Joint
16 Exhibit? It's showing on the Plaintiffs' list as being
17 withdrawn.

18 MR. FREEDMAN: I'm just trying to refresh
19 recollection, Your Honor.

20 THE COURT: You're not seeking --

21 MR. FREEDMAN: I'm not seeking to admit it.

22 THE COURT: All right. Thank you.

23 MR. FREEDMAN: Actually, Your Honor, I'm trying to
24 establish foundation for a further document down the line. So
25 this -- trying to establish who Nick Caley is first. Trying to

1 refresh Dr. Wright's recollection as to who Nick Caley was and
2 that's all this document will be used for.

3 THE COURT: All right.

4 BY MR. FREEDMAN:

5 Q. Dr. Wright --

6 MR. FREEDMAN: Thank you, Ms. Vela.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, do you recall that as part of these publicity
9 efforts you were scheduled to meet with a variety of
10 journalists?

11 A. I ended up meeting with a few journalists, yes.

12 MR. FREEDMAN: Ms. Vela, can you please bring up P359.

13 And you know what, Ms. Vela? Can you take that down
14 for a moment.

15 BY MR. FREEDMAN:

16 Q. And do you recall that these media organizations were
17 attempting to prepare you for various interviews?

18 A. No. That's not how I would say it.

19 THE COURT: Let me know when it might be a good time
20 for us to adjourn for the day.

21 MR. FREEDMAN: Whenever works for the Court, Your
22 Honor. Now is fine.

23 THE COURT: Then, Ladies and Gentlemen, as you can
24 see, it is a few minutes after 5:00. We're going to adjourn
25 for the evening. Please remember you're not to discuss the

1 case with anyone, nor permit anyone to speak to you.

2 Everything learned about the case is learned within this
3 courtroom. You're not to conduct any outside research.

4 I will see you tomorrow morning. Please make your way
5 into the building. Be ready to come into the courtroom by
6 10:00, so if you'll come into the building about 9:45, 9:50.

7 Have a pleasant evening and I'll see you tomorrow
8 morning.

9 (Jury not present, 5:04 p.m.)

10 THE COURT: Dr. Wright, you can join your attorneys at
11 counsel table.

12 THE WITNESS: Thank you, Your Honor.

13 THE COURT: And with regard to the YouTube video, why
14 don't you show or at least provide the link for Ms. McGovern
15 and we can address it if need be tomorrow morning.

16 What other issues do we have?

17 MS. MCGOVERN: I've received it, Your Honor. Thank
18 you very much.

19 MR. FREEDMAN: The only other issue, Your Honor, is
20 that --

21 THE COURT: Go ahead and have a seat, please.

22 Yes, Mr. Freedman, what other issues, sir?

23 MR. FREEDMAN: Your Honor, the only other issue is
24 that this case involves a claim for punitive damages. In a
25 claim for punitive damages, the net worth of the Defendant is

1 at issue. And so Plaintiffs are seeking to introduce
2 statements by the Defendant himself stating that he's a
3 multi-billionaire and other comments to advise the jury of net
4 worth for the punitive damages claim. So, Ms. McGovern
5 objected on relevance.

6 MS. MCGOVERN: Yeah, Your Honor. We object to net
7 worth, you know, testimony elicited at this juncture. There's
8 been nothing in the record that has linked the Plaintiffs'
9 claim to a single public address of Bitcoin. There's been
10 nothing in this case that links a single identifiable piece of
11 intellectual property to David Kleiman. And --

12 THE COURT: That's somewhat beside the point. And the
13 argument is that there is a claim for punitive damages. So why
14 would that not be relevant?

15 MS. MCGOVERN: Your Honor, we understand. But we
16 believe that at this juncture, punitive damages net worth
17 testimony in the absence of any evidence in the case with
18 respect to the underlying claims is unduly prejudicial. It's
19 going to lead the jury to believe that simply because
20 Dr. Wright may have the rights to what is an enormous amount of
21 Bitcoin, it is going to sway the jury and cause the jury to be
22 sympathetic on the claims before them without first
23 adjudicating whether, in fact, the claims exist.

24 At this juncture, without the requisite predicate of
25 the underlying intellectual property -- and there is not a

1 single piece of intellectual property that's been
2 established -- without a single public address with Bitcoin.

3 In fact, Your Honor, I'd like to raise, in light of
4 the fact that we're addressing punitive damage testimony and
5 evidence in this case at this juncture, we have been not
6 advised if the confidential witness is even going to be
7 testifying with respect to the particular public address that
8 is not claimed to be owned by Dr. Wright, but is now -- somehow
9 appears to be part of a public address with an enormous amount
10 of Bitcoin that's going to become part of the Plaintiffs'
11 claim. It's convoluted, Your Honor. It's unduly prejudicial.
12 It's premature.

13 MR. FREEDMAN: Your Honor, I would object strongly to
14 the characterization that there's been no evidence that there
15 was joint Bitcoin mining in this case and the creation of
16 intellectual property. Defendants will have an opportunity to
17 move for directed verdict, and certainly this Court will not be
18 persuaded by net worth testimony. And so if there really has
19 been no evidence, the Court will ensure the case does not
20 proceed further.

21 At this point, there was no motion to bifurcate the
22 trial to bifurcate punitives from compensatories. Punitive
23 damages is a live claim in this action, and it is quite clear
24 that net worth evidence is permissible and relevant to the
25 claims at issue.

1 MS. MCGOVERN: Your Honor, if I may be heard on a
2 final point?

3 THE COURT: Ms. McGovern?

4 MS. MCGOVERN: And that is that the evidence that's
5 being elicited with respect to net worth at this juncture is
6 not to establish the necessity for punitive damages at this
7 point. It is to sway the jury on sympathy grounds.

8 And in light of the fact that there is an enormous
9 disparity, we have a deceased individual and we have a person
10 who is alive and we have an alleged amount of Bitcoin. It is
11 going to be prejudicial. It is 403. It's improper and it's
12 also unnecessary, Your Honor.

13 There is a procedure that can provide the Plaintiffs
14 at the proper time with the evidence that they need when the
15 jury is properly going to decide it. At this point, there's
16 nothing that's going to happen here except an unfair bias
17 against Dr. Wright. And we've seen that with respect to the
18 YouTube video and with respect to the comment regarding having
19 more money than Rwanda.

20 THE COURT: But when you represent to the Court that
21 there's a procedure that is necessary, that's what this trial
22 is for. The parties had a full opportunity during the course
23 of discovery to file a motion with regard to bifurcating this
24 issue.

25 Certainly, the Court could have addressed the issue of

1 punitive damages. And I look at both parties' proposed verdict
2 forms, and it states specifically on the verdict form that has
3 been submitted by both parties: "If you found in favor of the
4 Estate of Dave Kleiman and/or W&K Info Defense Research, LLC
5 for their conversion, fraud, or constructive fraud claims, then
6 you must decide whether punitive damages are appropriate. And
7 if so, evaluate the amount of punitive damages to award to the
8 Estate of David Kleiman and/or W&K Info Defense Research."

9 So, to the extent that evidence is properly presented
10 with regard to punitive damages, I agree that net worth and
11 assets that may be available is certainly admissible at the
12 time of trial.

13 And if there is no evidence, as you say, Ms. McGovern,
14 then the Court will address that at close of either the
15 Plaintiffs' case or the close of all the evidence. But at this
16 point, I don't see why 403 would bar it when its relevance is
17 certainly not a remote concept. It certainly outweighs any
18 danger of unfair prejudice when it's a direct issue in this
19 case, and the Court will be instructing the jury in that
20 regard.

21 MS. MCGOVERN: Your Honor, if I may make a final point
22 because I understand we obviously have a record to make as
23 well, Your Honor. So, for purposes of being able to fully make
24 that record, I'd like to state the following: We understand
25 that there are procedures and there is timing for things to be

1 done and that's been raised multiple times. So to the extent
2 that we have missed that mark in certain points -- I don't
3 believe that we have, but that doesn't mean that at a given
4 juncture in a trial -- you can recognize that the circumstances
5 of that trial, the evidence that's been elicited in the trial,
6 don't require an evaluation of what is appropriate.

7 At this point, Your Honor, we object to the
8 elicitation of what Dr. Wright's net worth is for purposes of
9 punitives when we haven't seen anything that shows the Bitcoin
10 that Dave Kleiman is entitled to or intellectual property that
11 Dave Kleiman contributed to that has an ascertainable value and
12 damages that can be ascertainable.

13 So, for purposes of eliciting that testimony now, we
14 believe there's only one result that can happen. It's
15 certainly not probative value for the Plaintiffs in terms of
16 being able to establish damages at this point, Your Honor.
17 It's for purposes of establishing the disparity and the
18 sympathy with a deceased individual and a wealthy one.

19 THE COURT: But you have not presented to the Court
20 any evidence or really by way of any case law or other support
21 that would tell the Court that Mr. -- or Dr. Wright's net worth
22 or the amount of Bitcoin that he may hold and the value of same
23 would not be admissible in evidence.

24 MS. MCGOVERN: No, Your Honor.

25 THE COURT: I mean, there's no authority for that at

1 this point when punitive damages are a direct issue. I know
2 you're making the argument, but there's no evidence. And
3 that's an argument to be made at the close of the Plaintiffs'
4 case.

5 But that's somewhat separate and apart from whether
6 the Plaintiff has the opportunity to present evidence of
7 Dr. Wright's net worth and the amount of Bitcoin or other
8 property he may hold.

9 MS. MCGOVERN: Your Honor, if I may, I think this is
10 an unusual case. In fact, we've seen with respect to the
11 electronic devices, that they didn't even want to bring them
12 because of the concern with respect to those devices.

13 We've also had procedures to seal the courtroom for an
14 individual, a non-party, because of the concern over Bitcoin.
15 This is an unusual case. The Bitcoin actually has an unusual
16 value, and everybody's watching.

17 So, to the extent that 403 applies to a non-party
18 confidential witness, to the extent 403 applies to direct
19 physical evidence that perhaps contains Bitcoin, but it's
20 encrypted and we can't even show the jury, we think at a
21 minimum, Your Honor, it applies to the Defendant whose evidence
22 with respect to his net worth is not necessary at this
23 juncture.

24 So, to the extent, Your Honor, that I need to make a
25 motion to bifurcate that evidence at this juncture to preserve

1 that right so that the evidence and the facts of this case are
2 decided objectively without sympathy, I would ask the Court to
3 consider that.

4 THE COURT: I set a deadline long ago for the parties.

5 MS. MCGOVERN: I understand.

6 THE COURT: I have addressed in over 700 filings in
7 this case many motions that the parties have filed and the
8 Court has addressed -- Judge Reinhart has addressed, I've
9 addressed -- and the time for filing a motion to bifurcate that
10 issue has long passed.

11 So, if there's some case law that the Court should
12 consider that would take this case out of the realm of cases
13 where the Plaintiffs are seeking not only compensatory damages
14 but punitive damages with regard to certain claims, you can
15 provide that case law to the Court.

16 MS. MCGOVERN: Thank you, Your Honor.

17 THE COURT: But absent that, you certainly have the
18 right to inquire.

19 MS. MCGOVERN: We very much appreciate the opportunity
20 to do that. And again, Your Honor, it really is -- it's not a
21 goose/gander. It's just level playing field. We've seen 403
22 applied in other circumstances. I think 403 -- Rule 403 is
23 directly in play here. We'll see if we can provide Your Honor
24 with case law that can perhaps, you know, shed light on that
25 and, you know, essentially support what we're seeking here,

1 which, frankly, we don't think prejudices the Plaintiff.

2 THE COURT: Well, I mean, the only -- I would suggest
3 that if there is an issue with regard to the amount of
4 information or the type of information, then perhaps the
5 parties can stipulate with regard to a certain amount of
6 Bitcoin or value or net worth and that would certainly obviate
7 the need to move forward with an extensive examination in that
8 area, but I'll leave that to the attorneys.

9 And with regard to any case law that would tell the
10 Court that this case should be treated any differently with
11 regard to the presentation of evidence related to punitive
12 damages, I'm happy to consider it, as I was happy to consider
13 the case law today.

14 MS. MCGOVERN: Thank you, Your Honor. And again,
15 another point that needs to be made here, Your Honor, also, is
16 simply we're talking about an individual and his family, right?
17 Who is traveling here for purposes of defending this case.

18 And to the extent that there's concern that others
19 have raised with respect to that issue, certainly that same
20 concern applies to Dr. Wright and his family.

21 MR. FREEDMAN: Your Honor, if I may, shortly. Two
22 things.

23 One, statements that we were about to introduce are
24 very public statements by Dr. Wright that he is a billionaire.

25 Two, Ms. McGovern's argument would mean that any

1 billionaire would have a prejudicial argument to be made when
2 punitive damages are in play because his net worth is
3 astronomical.

4 Third, Your Honor, the only thing I would say is I
5 suspect we will finish the examination of Dr. Wright tomorrow.
6 So, to the extent Ms. McGovern has case law, can she please
7 present it tomorrow morning before we start?

8 MS. MCGOVERN: Of course, Your Honor.

9 THE COURT: All right. And once again, you can come
10 to an agreement and it can be by way of a stipulation so that
11 you can avoid many of the questions that you might want to ask,
12 but --

13 MR. FREEDMAN: We'd be happy to review a stipulation,
14 Ms. McGovern.

15 MS. MCGOVERN: Perfect. Thank you so much, Your
16 Honor.

17 THE COURT: Okay. Is there anything else that we need
18 to address?

19 I'm going to see parties shortly before 10:00 tomorrow
20 morning. All right?

21 MR. FREEDMAN: Thank you, Your Honor.

22 THE COURT: Anything further on behalf of the
23 Plaintiffs?

24 MR. FREEDMAN: No, Your Honor.

25 THE COURT: On behalf of the Defendant?

1 MS. MCGOVERN: No, Your Honor.

2 THE COURT: Okay. Have a pleasant evening. See you
3 tomorrow morning.

4 (Proceedings concluded at 5:16 p.m.)

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1 UNITED STATES OF AMERICA)
2 ss:
3 SOUTHERN DISTRICT OF FLORIDA)

4 C E R T I F I C A T E

5 I, Yvette Hernandez, Certified Shorthand Reporter in
6 and for the United States District Court for the Southern
7 District of Florida, do hereby certify that I was present at
8 and reported in machine shorthand the proceedings had the 9th
9 day of November, 2021, in the above-mentioned court; and that
10 the foregoing transcript is a true, correct, and complete
11 transcript of my stenographic notes.

12 I further certify that this transcript contains pages
13 1 - 247.

14 IN WITNESS WHEREOF, I have hereunto set my hand at
15 Miami, Florida this 18th day of November, 2021.
16

17 /s/Yvette Hernandez
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MR. BRENNER: [5]
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MR. FREEDMAN: [426]

MR. KASS: [1]
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MR. LAGOS: [1]
3/24

MR. MESTRE: [1]
4/8

MR. RIVERO: [9]
4/6 131/6 131/10
167/9 167/12
167/18 167/25
168/6 168/10

MR. ROCHE: [1]
3/22

MR. ZACK: [1]
3/23

MS. MCGOVERN: [184] 3/5 3/11
4/4 4/12 5/1 13/14
14/7 18/22 19/4
19/24 20/1 22/6
22/22 24/16 25/5
28/7 28/22 31/14
33/5 35/18 39/25
41/7 46/8 48/13
48/16 50/25 52/20
52/22 53/16 58/24
59/4 60/20 62/11
62/15 62/17 62/19
64/15 66/17 71/25
72/23 73/13 73/20
74/3 75/6 76/22
77/4 81/7 81/9
82/22 84/5 84/10
86/15 87/23 89/14

89/24	90/1	90/3	228/13	228/19		
90/8	91/2	91/5	228/22	228/24		
91/7	91/11	96/5	229/10	229/25		
96/14	97/20	98/10	230/4	230/7	231/10	
98/25	101/15		232/4	232/6	233/12	
103/21	104/16		233/15	233/19		
105/1	105/4	105/6	236/17	237/6		
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116/24	119/4		240/21	241/24		
119/25	120/23		242/9	243/5	243/16	
121/13	122/10		243/19	244/14		
122/13	123/17		245/8	245/15	246/1	
125/15	125/17		THE COURT: [222]			
125/20	125/23		3/2	3/6	3/10	3/12
125/25	126/8		4/3	4/15	5/20	5/25
126/25	127/25		6/2	13/18	14/9	
130/18	133/11		17/3	18/24	19/5	
134/16	141/23		19/25	20/2	20/5	
142/3	146/2	146/20	22/7	22/23	25/7	
149/21	150/22		28/8	28/23	28/25	
150/24	152/23		31/17	33/8	35/20	
153/15	154/22		40/3	41/12	43/8	
155/4	157/12		46/11	48/15	48/18	
157/15	157/17		50/12	51/1	52/21	
160/20	162/21		52/23	53/18	58/23	
162/24	163/11		59/5	60/11	60/14	
163/13	164/12		60/17	60/22	61/18	
166/2	173/3	174/20	62/21	62/24	64/18	
175/9	177/11		64/20	64/25	66/18	
178/17	178/19		72/3	72/24	73/10	
182/10	184/10		73/18	73/22	74/4	
184/24	185/6		75/9	75/13	77/5	
186/22	191/19		81/8	81/10	82/24	
192/11	193/3		83/1	86/16	87/24	
193/10	193/22		89/15	90/9	91/14	
194/3	194/9	196/5	96/6	97/21	98/11	
200/10	202/17		99/1	101/16	103/24	
203/6	204/6	205/6	104/18	105/2	107/3	
207/20	208/12		107/8	107/10		
212/7	217/23	219/6	109/15	109/19		
222/3	223/16	225/9	109/21	112/25		
226/9	227/1	227/4	113/2	114/23	117/2	
227/7	227/10		117/4	117/8	117/11	
227/20	228/1		117/15	117/19		

212/24

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211/20 212/3 215/6

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209/13 211/10

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247/17

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118/21

035 [2] 2/20 185/8**036 [2]** 2/20

186/24

042 [2] 2/15

101/17

045 [2] 2/11 51/2**048 [2]** 2/15 104/1**064409 [2]** 195/6

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213/21 214/9

214/14

\$1,850 [2] 208/4

209/13

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10 [3] 1/11 6/6 138/24	12 [2] 88/24 213/5	158 [7] 125/13
10-2 [2] 1/24 247/18	120 [4] 2/19	125/14 125/16
10-minute [1] 56/25	160/17 160/18 160/22	125/17 125/19
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104 [1] 2/15	129 [3] 2/17 146/9	
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10:00 [2] 236/6 245/19	12:53 [2] 107/7 107/9	
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10:12 [1] 6/1	12th [2] 40/22	
10th [3] 99/6 151/24 152/3	73/6	
112 [3] 2/8 2/16 25/9	13 [8] 2/7 2/7	
113 [1] 2/16	62/23 108/1 115/7	
116 [2] 35/12	139/14 198/11	
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	133 [4] 2/17 2/17	
	91/1 91/4	
	13th [1] 183/8	
	14 [11] 2/10 2/21	
	43/4 43/9 62/23	
	196/2 196/6 196/8	
	197/6 198/10	
	198/22	
	146 [2] 2/17 2/17	
	149 [1] 9/18	
	15 [7] 143/15	
	149/14 149/16	
	150/3 153/7 155/25	
		217/16 217/17
		217/20 218/11
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1	126/18 2008 [10] 55/4 55/5 55/6 55/15 55/22 57/18 57/23 61/5 61/12 69/1 2009 [19] 26/14 26/15 26/20 27/11 45/22 46/25 47/8 47/15 47/19 57/20 108/7 135/9 135/11 155/13 159/8 159/10 161/16 219/22 220/20 2009/2010 [1] 161/7 2010 [12] 8/8 8/10 91/19 92/12 93/1 94/4 94/12 95/10 135/20 159/3 161/7 161/16 2011 [34] 8/12 9/4 11/9 19/18 22/1 75/19 76/16 78/20 88/16 90/23 92/4 95/17 129/7 129/8 157/6 183/18 183/22 184/1 185/12 188/24 190/3 190/12 191/1 192/4 199/25 200/1 200/20 207/10 216/4 217/7 218/13 219/10 219/12 220/16 2012 [31] 10/6 24/3 24/5 24/6 24/7 24/12 24/14 25/13 26/18 98/17 99/6 101/3 101/21 107/23 171/2 186/1 186/8 186/17 190/19 193/14 195/18 195/23 197/2 201/11	201/13 203/13 202/19 204/14 207/18 217/5 220/6 2013 [19] 9/4 36/4 40/21 41/20 54/22 73/16 80/7 81/3 81/24 84/21 115/20 148/3 148/6 148/13 148/24 150/2 201/8 203/11 222/10 2014 [47] 15/5 16/5 16/7 16/15 19/7 20/9 20/13 25/19 29/3 36/5 37/4 37/13 37/19 38/1 38/4 38/14 40/21 41/21 54/15 66/6 66/23 70/10 76/18 77/15 78/24 85/19 88/1 121/17 138/23 144/13 146/25 192/22 204/12 206/7 207/6 209/11 209/19 209/24 213/18 216/1 216/8 217/1 217/16 217/20 218/11 218/23 220/7 2015 [10] 21/10 37/23 49/11 82/9 86/4 86/24 111/25 113/11 129/6 129/8 2016 [7] 38/9 40/19 40/22 60/7 133/18 133/22 230/20 2018 [2] 65/17 73/6 2019 [15] 55/1 70/25 71/8 71/16 88/24 89/23 91/1 104/24 123/16 157/10 157/13
18 [5] 72/7 142/13 157/11 157/14 157/16 18-80176 [1] 3/14 182 [2] 2/19 2/19 185 [2] 2/20 2/20 186 [2] 2/20 2/20 189 [1] 11/4 18th [10] 16/5 37/4 37/13 38/1 38/4 38/14 144/13 156/2 224/13 247/15 19 [4] 62/10 62/14 89/23 142/13 191 [2] 2/21 2/21 1933 [4] 169/23 171/2 171/8 171/12 196 [2] 2/21 2/21 1961 [1] 107/21 1998 [3] 108/2 157/5 178/10 1:53 [1] 107/9 1:57 [1] 109/20 1st [5] 170/11 170/13 170/21 189/21 190/2	126/18 2008 [10] 55/4 55/5 55/6 55/15 55/22 57/18 57/23 61/5 61/12 69/1 2009 [19] 26/14 26/15 26/20 27/11 45/22 46/25 47/8 47/15 47/19 57/20 108/7 135/9 135/11 155/13 159/8 159/10 161/16 219/22 220/20 2009/2010 [1] 161/7 2010 [12] 8/8 8/10 91/19 92/12 93/1 94/4 94/12 95/10 135/20 159/3 161/7 161/16 2011 [34] 8/12 9/4 11/9 19/18 22/1 75/19 76/16 78/20 88/16 90/23 92/4 95/17 129/7 129/8 157/6 183/18 183/22 184/1 185/12 188/24 190/3 190/12 191/1 192/4 199/25 200/1 200/20 207/10 216/4 217/7 218/13 219/10 219/12 220/16 2012 [31] 10/6 24/3 24/5 24/6 24/7 24/12 24/14 25/13 26/18 98/17 99/6 101/3 101/21 107/23 171/2 186/1 186/8 186/17 190/19 193/14 195/18 195/23 197/2 201/11	201/13 203/13 202/19 204/14 207/18 217/5 220/6 2013 [19] 9/4 36/4 40/21 41/20 54/22 73/16 80/7 81/3 81/24 84/21 115/20 148/3 148/6 148/13 148/24 150/2 201/8 203/11 222/10 2014 [47] 15/5 16/5 16/7 16/15 19/7 20/9 20/13 25/19 29/3 36/5 37/4 37/13 37/19 38/1 38/4 38/14 40/21 41/21 54/15 66/6 66/23 70/10 76/18 77/15 78/24 85/19 88/1 121/17 138/23 144/13 146/25 192/22 204/12 206/7 207/6 209/11 209/19 209/24 213/18 216/1 216/8 217/1 217/16 217/20 218/11 218/23 220/7 2015 [10] 21/10 37/23 49/11 82/9 86/4 86/24 111/25 113/11 129/6 129/8 2016 [7] 38/9 40/19 40/22 60/7 133/18 133/22 230/20 2018 [2] 65/17 73/6 2019 [15] 55/1 70/25 71/8 71/16 88/24 89/23 91/1 104/24 123/16 157/10 157/13
2	126/18 2008 [10] 55/4 55/5 55/6 55/15 55/22 57/18 57/23 61/5 61/12 69/1 2009 [19] 26/14 26/15 26/20 27/11 45/22 46/25 47/8 47/15 47/19 57/20 108/7 135/9 135/11 155/13 159/8 159/10 161/16 219/22 220/20 2009/2010 [1] 161/7 2010 [12] 8/8 8/10 91/19 92/12 93/1 94/4 94/12 95/10 135/20 159/3 161/7 161/16 2011 [34] 8/12 9/4 11/9 19/18 22/1 75/19 76/16 78/20 88/16 90/23 92/4 95/17 129/7 129/8 157/6 183/18 183/22 184/1 185/12 188/24 190/3 190/12 191/1 192/4 199/25 200/1 200/20 207/10 216/4 217/7 218/13 219/10 219/12 220/16 2012 [31] 10/6 24/3 24/5 24/6 24/7 24/12 24/14 25/13 26/18 98/17 99/6 101/3 101/21 107/23 171/2 186/1 186/8 186/17 190/19 193/14 195/18 195/23 197/2 201/11	201/13 203/13 202/19 204/14 207/18 217/5 220/6 2013 [19] 9/4 36/4 40/21 41/20 54/22 73/16 80/7 81/3 81/24 84/21 115/20 148/3 148/6 148/13 148/24 150/2 201/8 203/11 222/10 2014 [47] 15/5 16/5 16/7 16/15 19/7 20/9 20/13 25/19 29/3 36/5 37/4 37/13 37/19 38/1 38/4 38/14 40/21 41/21 54/15 66/6 66/23 70/10 76/18 77/15 78/24 85/19 88/1 121/17 138/23 144/13 146/25 192/22 204/12 206/7 207/6 209/11 209/19 209/24 213/18 216/1 216/8 217/1 217/16 217/20 218/11 218/23 220/7 2015 [10] 21/10 37/23 49/11 82/9 86/4 86/24 111/25 113/11 129/6 129/8 2016 [7] 38/9 40/19 40/22 60/7 133/18 133/22 230/20 2018 [2] 65/17 73/6 2019 [15] 55/1 70/25 71/8 71/16 88/24 89/23 91/1 104/24 123/16 157/10 157/13
20 [13] 8/23 84/4 84/7 91/1 91/4 104/24 105/4 105/5 125/14 125/16 125/24 125/24 212/24 20-minute [4] 60/12 60/14 162/10 162/13 200 [1] 1/14 2000 [1] 86/4 2004 [1] 178/9 2005 [1] 178/25 2007 [2] 125/8	126/18 2008 [10] 55/4 55/5 55/6 55/15 55/22 57/18 57/23 61/5 61/12 69/1 2009 [19] 26/14 26/15 26/20 27/11 45/22 46/25 47/8 47/15 47/19 57/20 108/7 135/9 135/11 155/13 159/8 159/10 161/16 219/22 220/20 2009/2010 [1] 161/7 2010 [12] 8/8 8/10 91/19 92/12 93/1 94/4 94/12 95/10 135/20 159/3 161/7 161/16 2011 [34] 8/12 9/4 11/9 19/18 22/1 75/19 76/16 78/20 88/16 90/23 92/4 95/17 129/7 129/8 157/6 183/18 183/22 184/1 185/12 188/24 190/3 190/12 191/1 192/4 199/25 200/1 200/20 207/10 216/4 217/7 218/13 219/10 219/12 220/16 2012 [31] 10/6 24/3 24/5 24/6 24/7 24/12 24/14 25/13 26/18 98/17 99/6 101/3 101/21 107/23 171/2 186/1 186/8 186/17 190/19 193/14 195/18 195/23 197/2 201/11	126/18 2008 [10] 55/4 55/5 55/6 55/15 55/22 57/18 57/23 61/5 61/12 69/1 2009 [19] 26/14 26/15 26/20 27/11 45/22 46/25 47/8 47/15 47/19 57/20 108/7 135/9 135/11 155/13 159/8 159/10 161/16 219/22 220/20 2009/2010 [1] 161/7 2010 [12] 8/8 8/10 91/19 92/12 93/1 94/4 94/12 95/10 135/20 159/3 161/7 161/16 2011 [34] 8/12 9/4 11/9 19/18 22/1 75/19 76/16 78/20 88/16 90/23 92/4 95/17 129/7 129/8 157/6 183/18 183/22 184/1 185/12 188/24 190/3 190/12 191/1 192/4 199/25 200/1 200/20 207/10 216/4 217/7 218/13 219/10 219/12 220/16 2012 [31] 10/6 24/3 24/5 24/6 24/7 24/12 24/14 25/13 26/18 98/17 99/6 101/3 101/21 107/23 171/2 186/1 186/8 186/17 190/19 193/14 195/18 195/23 197/2 201/11

2
 USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 182 of 254
2019... [4] 157/21
 183/8 183/19 186/2
2020 [13] 62/9
 62/13 63/2 84/4
 84/12 125/13
 151/24 152/3
 189/21 190/2
 224/13 227/24
 231/4
2021 [3] 1/5 247/9
 247/15
205 [2] 2/22 2/22
208 [1] 153/21
20th [2] 55/23
 71/8
21 [4] 56/25 97/4
 114/22 115/18
211 [1] 88/24
212 [7] 2/7 2/22
 2/22 22/8 22/14
 89/23 148/16
21st [2] 113/11
 207/10
22 [5] 2/7 2/7
 157/11 157/14
 157/16
221 [1] 2/23
222 [1] 2/23
223 [2] 2/23 2/23
22nd [2] 101/3
 101/21
23 [2] 84/9 140/6
23rd [8] 55/24
 186/1 186/8 186/17
 195/18 203/19
 222/10 227/24
24 [7] 35/12 36/23
 88/24 104/24 105/4
 105/5 108/14
24-character [1]
 114/8
245,103 [1] 115/21

247 [3] 1/8 2/2
 247/13
24th [8] 54/15
 183/18 183/22
 184/1 185/12
 188/23 190/11
 192/4
25 [2] 2/8 2/8
2525 [1] 1/21
256 [2] 112/11
 114/8
26th [4] 16/7
 16/15 20/13 37/19
27 [1] 139/20
271 [3] 40/25
 41/25 179/12
28 [1] 89/16
2800 [1] 1/17
286 [1] 107/20
28th [4] 157/10
 157/13 157/21
 216/13
29 [1] 90/10
290 [2] 2/16 113/3
298 [1] 105/6
299 [2] 104/24
 105/7
2d [1] 108/1
2nd [3] 1/17 37/22
 146/25

3

30 [9] 27/5 29/10
 31/9 34/18 39/2
 47/8 91/8 118/25
 136/21
300,000 [3] 145/25
 147/11 147/20
305 [1] 247/19
30th [10] 36/4
 41/21 65/17 80/7
 81/2 81/24 84/21
 115/20 135/11
 216/12

31 [6] 2/8 2/8
 2/9 123/18 143/5
 225/7
31st [9] 54/24
 133/2 133/4 133/17
 148/3 148/6 148/12
 148/24 150/2
320 [2] 2/9 35/21
33 [3] 2/9 2/9
 125/3
33128 [2] 1/24
 247/18
33131 [2] 1/14
 1/18
33134 [1] 1/22
333 [2] 2/17
 133/13
35 [5] 2/9 2/9
 128/3 132/6 188/9
350,000 [3] 42/25
 44/5 180/8
359 [8] 130/20
 131/16 131/17
 131/18 167/13
 167/16 167/17
 167/18
36 [2] 128/24
 188/8
381 [2] 2/11 59/6
388 [1] 107/21
393888 [3] 214/18
 215/2 215/3
3:14 [1] 162/12
3:15 [1] 162/25
3:29 [1] 162/25
3:36 [1] 168/14
3B [1] 199/13
3rd [2] 56/21
 57/19
3s [1] 132/17

4

40 [1] 46/14
400 [2] 1/24

4

400... [1] 247/18
403 [7] 239/11
 240/16 242/17
 242/18 243/21
 243/22 243/22
41 [2] 2/10 2/10
416,000 [1] 223/22
43 [2] 2/10 2/10
44 [1] 224/12
446 [2] 2/18 151/3
45-page [1] 29/6
464 [1] 10/8
49 [3] 40/25 41/24
 179/10
4:22 [1] 171/2
4th [5] 88/23
 89/23 91/1 104/24
 123/16

5

50 [7] 148/8
 154/17 154/21
 159/3 159/4 194/18
 194/18
51 [3] 2/11 2/11
 189/16
518 [5] 2/21
 191/25 218/4 218/6
 218/7
522 [2] 2/22 205/8
523 [2] 2/22
 212/11
523-5698 [1]
 247/19
5398476 [1] 107/23
550,000 [1] 145/21
5500 [1] 1/14
554 [2] 2/18
 153/17
556 [1] 108/6
56 [3] 115/13
 115/14 115/20
5698 [1] 247/19

57 [2] 115/13

115/14
570,000 [1] 111/18
59 [2] 2/11 2/11
591 [4] 2/14 98/10
 98/11 99/2
5:00 [1] 235/24
5:04 [1] 236/9
5:16 [1] 246/4

6

607 [3] 2/10 41/14
 179/11
633 [2] 2/23
 223/18
64 [1] 2/12
65 [1] 2/12
650,000 [2] 42/21
 180/3
66 [2] 2/12 2/12

7

700 [1] 243/6
700,000 [2] 147/12
 147/20
73 [2] 156/7 156/7
742 [3] 2/9 32/10
 33/10
77 [2] 2/13 2/13
7th [1] 70/10

8

800-something [1]
 221/12
80176 [1] 3/14
803 [1] 108/14
804 [1] 108/15
807 [5] 4/19 4/23
 5/15 108/16 109/11
81 [2] 2/13 2/13
820 [1] 158/25
820,200 [2] 155/2
 159/1
820,250 [1] 159/5
822 [2] 2/19

182/12

823 [2] 2/13

119/23

825,000 [1] 161/9
853 [1] 64/18
853.1 [3] 2/12
 64/22 65/1
86 [2] 2/14 2/14
864 [3] 2/13 81/8
 81/11
865 [2] 2/14 86/17
8th [2] 183/18
 186/2

9

90s [1] 226/16
93 [1] 231/23
97 [1] 156/2
99 [3] 2/14 2/14
 129/17

992 [1] 231/3

9:18-cv-80176-BB

[1] 1/2

9:45 [1] 236/6

9:50 [1] 236/6

9th [2] 200/3
 247/8

A

a.m [8] 1/6 3/1
 6/1 60/13 60/16
 60/16 60/21 171/2

Abacus [3] 213/21
 214/1 215/20

able [14] 63/15
 74/23 95/12 97/10
 109/10 110/22
 115/2 115/18
 172/22 174/1 177/6
 181/13 240/23
 241/16

about [112] 6/18
 9/16 11/3 11/9
 12/10 14/21 14/23

A

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 194 of 254
about... [105]
 22/1 28/3 29/17
 29/18 32/5 33/15
 44/13 44/20 48/2
 51/7 53/4 53/9
 55/23 56/19 56/20
 57/5 57/10 57/11
 58/18 58/19 66/3
 66/12 68/9 71/20
 74/18 74/23 76/25
 78/3 79/9 79/11
 79/12 79/25 82/12
 84/24 86/4 90/22
 91/21 91/24 93/5
 93/10 93/11 94/14
 98/5 99/14 99/15
 99/16 99/17 100/6
 100/14 100/15
 101/11 105/10
 106/19 106/25
 110/23 114/3 114/9
 116/3 120/20
 121/17 122/18
 123/15 125/4
 126/18 130/5 132/2
 132/4 133/6 133/8
 140/3 140/9 140/10
 140/16 145/21
 146/15 147/3
 156/12 162/4
 164/19 165/18
 167/2 167/3 168/11
 173/11 177/16
 179/17 179/20
 181/3 181/4 181/20
 202/15 202/20
 210/25 217/9
 217/11 220/14
 221/11 221/14
 221/23 222/10
 222/11 236/2 236/6
 244/16 244/23

above [12] 22/14

29/10 101/8 139/14
 140/3 173/22
 176/23 177/7
 193/19 199/19
 215/4 247/9
above-mentioned [1]
 247/9
absence [4] 122/7
 122/18 122/25
 237/17
absent [1] 243/17
absolutely [2]
 164/15 220/8
access [20] 79/17
 79/18 88/14 88/18
 89/4 89/19 90/15
 90/18 90/20 92/8
 92/15 92/17 92/18
 92/20 92/21 93/15
 122/14 128/11
 129/7 165/12
accessed [1] 123/7
accordance [1]
 183/11
account [46] 24/24
 27/8 76/15 78/17
 78/20 78/25 79/14
 79/15 79/16 79/17
 80/1 80/1 80/12
 82/14 83/8 85/1
 85/4 85/6 85/9
 86/22 87/19 88/9
 88/10 88/14 88/18
 88/19 89/4 89/20
 90/19 90/20 91/19
 92/8 92/15 92/17
 92/20 92/21 92/22
 93/15 116/10 165/7
 170/18 209/1 210/1
 211/17 215/10
 215/10
accountant [2]
 155/15 216/14

accountants [7]

147/13 148/14 149/15
 140/19 140/21
 150/9 158/16
accounting [2]
 68/23 160/7
accounts [7] 23/11
 45/17 75/17 92/7
 165/7 216/9 216/11
accuracy [1] 44/6
accurate [2] 5/13
 179/2
Achievement [1]
 68/5
acknowledge [2]
 188/4 189/15
acknowledged [1]
 164/5
across [9] 35/25
 81/15 94/11 136/11
 151/13 155/19
 175/14 175/17
 182/19
act [3] 191/1
 197/23 202/5
action [7] 14/12
 14/23 15/7 15/18
 54/2 180/10 238/23
actions [1] 181/17
activities [3]
 19/18 22/18 28/14
activity [1] 27/25
actor [1] 182/6
actual [7] 55/17
 59/18 171/5 176/22
 181/21 190/7
 220/13
actually [67] 4/16
 8/2 21/2 23/24
 23/25 32/1 32/3
 45/3 54/18 55/18
 57/8 57/9 58/2
 58/11 59/10 64/2
 73/3 88/1 88/11

A

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page: 165 of 254
actually... [48]
 88/15 89/10 92/12
 92/24 93/1 94/3
 95/3 97/16 97/24
 100/12 124/23
 130/3 132/4 132/8
 135/8 136/7 139/15
 140/18 140/21
 140/23 141/4 141/4
 158/2 159/3 161/24
 169/8 169/20
 170/16 170/19
 172/14 174/3
 193/15 193/16
 198/8 200/19
 201/19 201/25
 203/24 218/25
 225/4 229/14
 229/18 231/13
 232/20 233/1
 233/10 234/23
 242/15
add [1] 171/14
added [1] 164/22
addition [1] 135/5
additional [2]
 108/5 214/17
Additionally [2]
 124/10 206/23
address [43] 4/17
 12/21 15/11 60/18
 75/22 76/1 76/4
 76/8 81/21 95/21
 98/15 109/16 111/5
 113/13 113/14
 116/20 118/3 118/5
 154/3 154/5 163/3
 163/23 163/25
 171/9 171/11
 171/12 172/2
 172/18 172/19
 173/16 174/6

174/10 176/24	66/18 75/16 77/5
177/6 204/23 228/2	80/10 86/16 89/14
236/15 237/9 238/2	101/16 103/25
238/7 238/9 240/14	111/24 113/2 120/3
245/18	130/18 131/7
addressed [6] 75/8	131/11 131/12
239/25 243/6 243/8	133/12 145/23
243/8 243/9	145/24 146/21
addresses [20]	151/1 153/16
103/17 103/18	160/21 182/11
118/17 118/18	185/7 186/23
149/14 149/16	191/24 196/6 205/7
150/3 153/7 153/20	212/9 222/4 223/17
153/23 154/11	admitting [1]
154/13 154/16	105/21
164/6 171/24 223/9	adopt [1] 109/4
223/20 224/2 224/8	adopters [1] 59/16
224/20	advise [3] 16/8
addressing [1]	107/15 237/3
238/4	advised [1] 238/6
adjourn [3] 230/6	advisers [1] 100/9
235/20 235/24	AES [2] 112/11
adjudicating [1]	114/8
237/23	African [1] 229/13
administration [1]	after [45] 9/16
121/19	11/9 11/21 12/3
administrator [1]	17/8 20/13 22/1
220/22	22/20 22/21 39/10
admissibility [2]	52/4 62/1 73/15
109/11 164/3	75/19 76/16 77/17
admissible [3]	79/6 79/6 80/1
109/9 240/11	80/7 82/2 83/18
241/23	85/17 85/19 85/20
admission [1]	87/18 90/14 90/24
167/15	92/22 108/25 147/2
admit [6] 106/1	147/18 171/16
109/8 136/16	182/5 192/22
156/10 156/10	203/22 204/5 217/1
234/21	217/10 220/12
admitted [44] 2/6	222/10 222/25
13/19 22/7 25/8	226/6 233/22
31/17 33/9 35/20	235/24
41/12 43/8 51/1	afterwards [1]
59/5 61/17 64/25	221/16

A

USCA11 Case: 22-11150 Document 53-1012 Date Filed: 11/30/2022 Page: 136 of 234
against [60] 6/5
10/15 11/9 14/4
19/21 23/2 29/2
29/6 39/15 39/16
44/14 51/16 52/11
57/15 61/6 72/22
73/22 91/24 93/25
102/9 127/22 129/8
130/1 135/4 137/17
138/11 144/13
154/10 158/9
164/18 164/24
166/11 181/10
183/10 185/24
192/7 192/9 198/8
198/10 199/17
201/17 204/2 204/3
208/21 209/8
209/22 210/25
211/15 212/19
217/4 219/9 220/14
221/11 221/23
224/18 226/24
234/8 243/20
244/14 245/9
against [7] 7/3
14/12 15/8 15/18
111/17 205/22
239/17
aged [7] 204/12
204/15 205/24
206/3 206/13 207/9
207/10
agent [1] 197/23
agents [1] 165/18
ago [5] 26/17
49/18 56/5 178/11
243/4
agree [9] 14/25
120/22 165/24
202/5 228/7 228/7
233/19 233/19

240/10

agreed [12] 7/10
45/1 48/1 48/5
52/7 102/12 106/8
110/7 171/16
187/19 193/8
218/13
agreement [7]
102/21 102/25
199/6 199/24 203/3
204/13 245/10
ahead [12] 3/12
17/24 27/16 27/19
60/11 83/1 91/16
107/5 162/10 163/1
168/12 236/21
air [1] 57/1
alerted [1] 220/19
algorithmic [7]
20/23 44/3 181/12
181/18 199/10
199/18 200/6
Ali [2] 100/16
216/14
alias [2] 45/9
77/25
alive [2] 193/15
239/10
all [163] 4/3 5/20
5/25 6/2 6/5 8/13
10/12 10/14 13/5
13/21 15/25 18/15
20/5 23/10 25/17
27/4 27/15 29/12
29/24 32/15 34/11
36/22 39/5 40/9
48/8 51/21 51/23
52/11 52/17 53/2
56/13 57/1 57/4
59/1 60/11 60/17
60/22 63/15 74/4
81/10 82/12 83/1
83/16 89/15 91/14
92/10 93/14 95/3

95/16 95/23 95/24

95/25 98/1 98/3
100/16 100/17
101/8 102/15 106/8
106/9 107/14
109/21 110/7 110/7
112/14 121/18
121/23 122/1
122/14 122/23
123/7 123/7 124/17
125/9 127/16
129/12 129/13
129/21 129/25
135/5 135/19 136/1
136/24 137/14
137/14 138/5
139/21 140/25
145/5 145/19 146/9
148/8 156/20
158/12 158/19
159/22 162/10
162/13 163/1
165/14 165/23
166/16 167/8
167/20 167/23
168/2 168/8 168/12
168/15 171/10
172/16 173/5
176/21 177/20
181/9 183/25
184/19 184/23
188/10 188/18
189/3 189/20 190/1
190/2 190/18
190/22 191/3
193/25 197/5
197/24 198/4
198/21 199/23
200/21 200/21
201/23 212/5 215/1
216/11 216/20
216/21 218/1
218/15 218/16
220/13 222/13

A	also [43] 4/12 11/5 15/12 15/16 16/6 21/8 21/21 28/4 33/6 34/17 40/11 40/22 42/11 49/7 67/12 68/16 73/14 73/20 75/8 87/11 90/18 95/2 107/22 114/14 118/13 119/9 122/17 123/11 137/8 147/23 179/14 179/23 180/2 181/7 186/17 193/2 195/22 207/1 209/12 211/1 239/12 242/13 244/15 altered [3] 140/24 140/24 191/15 although [5] 11/14 95/5 108/3 123/11 124/5 always [6] 69/17 78/24 87/6 87/12 159/25 166/4 am [16] 6/25 21/25 32/1 62/8 70/14 70/15 100/11 102/5 141/19 141/19 142/1 157/3 196/12 202/3 229/4 231/9 AMANDA [2] 1/20 4/4 America [6] 136/9 136/11 160/3 182/25 183/12 247/1 American [3] 5/3 107/25 219/15 Amit [1] 4/13 amount [14] 119/17 119/18 138/1 211/9 215/7 221/21	237/20 238/9 202/10 240/7 241/22 242/7 244/3 244/5 amounts [5] 102/24 171/8 171/16 177/24 211/19 anal [1] 95/14 anchor [1] 58/1 ANDRES [2] 1/19 4/6 ANDREW [8] 1/16 3/20 15/13 16/2 16/20 37/3 140/5 220/19 angry [7] 105/18 105/18 105/25 229/15 229/18 231/14 232/11 Ann [2] 16/18 37/18 announce [1] 55/8 announcements [1] 55/10 announcing [1] 76/12 annoyed [2] 156/25 159/25 Annual [1] 208/4 another [35] 12/21 31/4 31/21 35/24 37/13 37/16 40/10 42/15 68/5 88/10 98/15 100/19 106/25 150/5 155/18 160/25 162/4 171/11 176/9 176/10 181/8 188/2 188/8 191/9 196/19 200/7 200/15 200/24 201/1 210/12 225/25 228/8 230/10 234/8 244/15
USCA11 Case: 22-11150 all... [17] 225/23 226/15 227/11 227/15 228/12 229/3 231/16 232/12 232/22 233/20 233/23 234/22 235/2 235/3 240/15 245/9 245/20 all-caps [2] 53/2 101/8 allege [1] 138/2 alleged [2] 119/18 239/10 allegedly [1] 204/5 allow [11] 40/3 72/3 74/6 82/22 117/16 121/15 127/2 184/12 184/25 193/12 212/9 allowed [8] 80/12 82/14 83/8 85/1 86/23 160/11 181/12 231/21 allowing [1] 94/19 allows [1] 55/17 almost [3] 15/5 116/6 192/18 along [2] 16/18 227/5 alpha [1] 56/22 already [15] 9/20 15/12 47/23 48/11 85/21 96/24 163/8 167/4 168/3 168/19 178/13 204/15 211/18 217/10 217/11 already-existing [1] 217/10	Document:53-10 Date Filed: 11/30/2022 Page: 137 of 254	

A

USCA11 Case: 22-11150 Document 53-108 Date Filed: 11/30/2022 Page: 138 of 254
answer [29] 876
14/10 17/3 20/5
54/1 71/22 74/9
82/23 82/24 84/18
84/23 85/3 85/6
85/8 85/10 85/13
90/13 90/14 104/13
106/21 122/4
125/23 125/25
126/1 126/12 158/2
158/5 219/20
229/12
answered [9] 48/14
48/16 52/22 127/5
127/13 127/25
192/12 193/22
219/7
answering [1]
92/14
answers [7] 63/6
84/16 108/10
108/22 140/9
144/20 157/24
Antonopoulos [1]
111/7
any [37] 16/8
20/25 23/25 58/23
75/12 94/25 112/25
119/24 123/6 124/5
124/11 125/11
126/23 127/23
128/17 136/16
165/8 165/17
165/19 171/14
174/21 174/23
176/12 176/12
176/13 179/4
191/18 221/13
222/2 236/3 237/17
240/17 241/20
241/20 244/9
244/10 244/25

anybody [1] 107/13
anyone [8] 10/24 142/21 244/20
89/19 173/13 177/4
181/16 206/9 236/1
236/1
anyone's [1] 128/9
anything [24] 4/17
5/23 32/14 50/7
60/17 64/23 104/25
109/15 111/22
127/17 129/10
134/13 173/13
174/4 178/8 179/2
179/5 181/10 189/9
221/12 225/4 241/9
245/17 245/22
Anyway [1] 93/9
anyways [1] 112/12
apart [5] 8/10
8/10 8/11 94/14
242/5
apologize [5] 3/2
6/5 6/7 91/3 96/14
apparently [1]
169/17
Appeals [1] 107/21
appear [3] 154/14
165/2 165/3
appearances [2]
1/12 3/16
appeared [1] 86/4
appearing [2] 73/5
157/20
appears [10] 120/5
120/9 131/3 165/13
189/6 189/7 189/9
218/12 233/22
238/9
appendix [1]
169/22
application [1]
63/21
applied [1] 243/22
applies [5] 108/12
242/17 242/18
242/21 244/20
appointed [1]
158/19
appreciate [3]
164/18 168/7
243/19
approach [1] 230/2
approached [2]
135/8 135/9
appropriate [3]
28/8 240/6 241/6
approximately [1]
138/12
April [17] 20/13
40/19 40/22 54/15
80/7 81/2 81/24
84/21 88/23 89/23
91/1 92/4 104/24
121/17 123/16
170/14 170/16
are [141] 3/6 3/9
3/11 6/23 7/1 9/11
20/7 22/20 26/8
31/24 32/24 38/8
39/5 41/12 41/18
43/16 43/21 43/23
44/1 48/4 50/18
57/4 57/11 67/7
67/24 74/25 75/3
79/5 92/14 93/4
93/19 94/24 95/12
97/16 99/9 100/15
100/17 105/21
106/18 106/20
106/21 106/22
106/23 106/24
107/13 108/4
108/10 108/12
109/5 114/7 114/8
116/6 120/1 120/11
121/11 123/21
124/1 124/19 126/9
127/3 128/11

A

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 139 of 254
are... [80] 136/19
 145/5 145/18
 149/16 152/18
 152/19 153/7 153/8
 154/10 154/13
 159/13 162/1 162/8
 165/20 165/23
 165/24 166/4
 166/16 167/1 167/4
 170/2 171/25
 172/12 172/16
 173/25 174/16
 177/3 177/5 178/15
 178/23 179/5
 180/19 180/21
 181/5 181/14
 184/14 185/14
 185/17 185/18
 188/25 189/1
 190/18 191/20
 197/11 197/19
 197/24 198/2 198/3
 198/4 198/5 198/6
 198/14 198/18
 198/18 199/11
 199/12 199/24
 200/17 200/21
 202/21 202/21
 206/2 207/19
 208/13 218/7
 219/21 224/2 224/8
 224/20 225/22
 234/3 234/12 237/1
 240/6 240/25 242/1
 243/1 243/13
 244/23 245/2
area [3] 221/16
 230/10 244/8
areas [1] 136/8
aren't [1] 193/2
arguing [2] 14/19
 170/22

argument [7]

127/17 218/19
 237/13 242/2 242/3
 244/25 245/1
argumentative [1]
 203/7
around [12] 31/9
 92/4 94/12 95/9
 137/9 138/6 139/16
 147/15 147/21
 158/15 161/25
 181/5
arrangement [3]
 21/8 199/14 203/4
arrangements [1]
 94/17
Arranging [1]
 210/10
Art [1] 136/21
article [6] 5/5
 5/6 108/8 108/11
 108/24 109/12
as [166] 1/3 4/20
 5/5 7/8 10/19
 13/16 17/10 20/15
 21/7 23/20 24/10
 25/21 27/7 27/20
 30/4 30/8 32/12
 33/1 34/13 34/17
 35/8 35/14 37/2
 39/10 40/17 43/11
 43/20 47/18 47/18
 49/18 50/14 50/16
 51/18 51/18 52/4
 52/4 53/4 56/21
 57/18 58/21 66/11
 71/19 76/24 86/4
 86/5 86/6 92/22
 92/24 93/3 94/17
 95/15 96/3 96/9
 98/13 99/14 99/24
 101/2 102/24
 102/25 106/8
 106/14 108/8 108/9

109/2 109/8 109/13

110/6 110/13

110/14 111/3

112/19 114/7

118/16 119/14

122/2 122/3 122/14

127/6 129/15

129/15 130/22

131/6 131/11

132/20 133/19

133/23 133/25

134/4 134/6 134/19

141/24 144/21

146/12 147/11

149/15 149/16

149/18 150/4

151/16 152/9

155/14 155/15

155/22 158/12

160/8 160/8 161/7

161/7 161/7 161/16

165/22 168/22

168/22 169/6 174/9

176/15 178/6

178/22 178/22

180/25 181/7

181/13 182/2 186/2

187/17 189/7 191/1

191/2 191/13

191/20 193/13

194/10 197/23

197/23 199/9

199/21 202/6

203/14 204/15

204/21 204/23

210/18 216/9

216/10 219/4

219/10 220/6

221/15 221/15

221/20 224/2 224/9

224/21 230/22

230/25 231/9 232/9

232/24 234/8

234/16 235/1 235/8

A

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 140 of 254
as... [4] 235/23
240/13 240/22
244/12
ascertainable [2]
241/11 241/12
Asian [1] 77/24
aside [1] 145/24
ask [19] 20/25
55/6 77/23 77/23
90/4 91/12 102/9
117/15 117/22
127/22 141/19
141/20 162/15
162/21 188/7 191/9
192/7 243/2 245/11
asked [36] 4/18
17/13 17/14 38/21
48/13 48/16 52/22
60/25 61/2 63/5
65/12 69/18 76/4
83/7 83/13 84/15
90/6 91/21 93/14
93/14 104/9 108/21
110/16 127/25
129/4 129/7 129/21
148/11 157/23
164/20 175/19
184/23 192/11
193/22 219/6
221/15
asking [7] 83/2
110/22 113/6
127/10 140/10
146/15 167/2
asks [3] 60/2
143/5 145/8
aspect [1] 5/14
ass [1] 190/23
assets [27] 15/22
30/20 30/23 38/23
39/5 97/16 102/12
144/3 145/5 145/12

153/10 160/11
177/23 178/15
190/22 199/5
199/12 199/24
203/2 226/8 226/13
226/15 226/16
226/17 226/18
226/21 240/11
assistance [1]
175/23
associated [9]
10/24 45/9 49/12
56/11 62/5 63/11
71/11 173/15
173/15
assume [1] 79/19
assumed [1] 226/6
Assurance [1]
107/20
astronomical [1]
245/3
Atheros [1] 170/18
ATO [30] 13/15
29/11 30/11 30/13
30/23 31/15 31/22
32/19 32/24 34/9
34/22 34/25 35/19
37/2 38/6 39/21
40/8 41/8 42/15
44/4 138/9 140/5
140/20 178/24
179/2 179/4 179/5
180/2 225/2 226/1
ATO's [2] 36/3
41/20
ato.gov.au [1]
16/2
attach [4] 183/17
185/14 185/25
185/25
attached [14] 13/4
16/4 16/6 184/1
184/14 189/5
199/15 203/5

206/17 206/24
208/25 208/25
209/20 210/3
attaches [2] 12/25
130/25
attachment [7]
184/16 184/23
187/8 187/13 189/4
189/5 190/5
attachments [3]
185/14 187/15
210/13
attempted [3]
109/8 128/7 190/21
attempting [3]
25/19 168/2 235/17
attend [1] 16/20
attends [1] 16/18
attorney [3] 131/8
140/5 174/22
attorney-client [1]
174/22
attorneys [6]
73/23 165/19
165/19 174/24
236/10 244/8
attribution [1]
169/20
audio [8] 71/24
72/6 72/6 72/8
72/11 72/14 73/12
74/13
audit [5] 100/17
135/23 216/17
217/12 217/12
audited [4] 39/21
95/13 135/25
203/24
auditing [1]
135/24
auditor [3] 95/14
95/15 160/8
auditors [4]
135/23 135/25

A

auditors... [2]
136/2 136/2
audits [2] 40/1
217/10
August [12] 29/3
38/1 38/4 38/14
65/16 94/12 95/9
115/20 135/12
138/23 144/13
159/3
Auscript [1] 16/6
AusIndustry [2]
135/22 136/4
AUSTRAC [1] 136/14
Australia [18]
6/18 7/3 27/3 32/5
40/1 45/4 45/7
47/7 84/19 135/10
136/14 147/14
155/12 159/16
178/9 189/17 217/5
220/24
Australian [58]
11/7 12/11 12/23
13/1 14/19 15/5
15/8 15/18 16/2
16/19 17/7 28/12
28/16 29/3 29/15
30/19 31/5 31/24
32/13 32/16 33/1
33/14 33/22 34/3
35/9 35/25 38/22
39/4 40/18 41/19
45/24 46/16 93/7
98/20 111/16
115/17 135/20
138/22 141/7 142/8
142/16 144/5
144/13 145/1
145/11 157/7 160/4
160/6 178/14
190/25 193/14

203/14 207/17

222/24 223/8 224/11
225/14 232/15
authentic [24]
180/20 180/21
183/19 183/23
186/3 186/8 187/5
187/11 188/23
189/4 192/2 192/9
192/18 194/8
194/14 194/16
194/17 194/17
194/20 194/21
195/22 197/8 199/5
207/15
authenticated [1]
119/5
authentication [3]
25/5 41/10 212/7
authenticity [4]
103/23 116/25
119/25 120/1
author [1] 45/13
authority [3] 4/19
4/19 241/25
authorization [1]
212/25
authorized [1]
6/20
autonomous [4]
199/22 201/21
202/7 202/13
autonomously [1]
201/25
available [7]
123/7 140/11
200/21 209/2 209/2
209/21 240/11
Avenue [2] 1/24
247/18
avoid [1] 245/11
award [1] 240/7
aware [7] 6/23 7/1
7/2 57/4 120/11

145/17 193/1

Aug 22 [1] 113/13
B
back [66] 8/14
20/10 27/10 28/18
33/11 36/10 37/8
38/21 46/12 51/6
53/14 53/20 57/6
59/11 60/17 60/18
60/22 62/18 67/21
70/14 74/9 74/10
78/14 90/2 92/6
94/15 105/12
105/13 107/10
107/14 109/16
109/21 109/23
117/2 118/11
121/22 133/14
136/11 140/4 153/2
154/9 160/4 160/10
162/14 162/17
162/19 163/2
167/14 168/15
171/10 176/17
176/20 179/18
183/14 187/10
188/19 190/7 192/2
205/15 206/24
207/5 208/23
209/11 209/25
212/24 226/16
backed [1] 57/12
background [2]
29/16 159/20
backups [2] 113/21
121/23
backwards [1]
167/19
Bad [2] 71/4 71/16
badly [1] 54/2
Bagnoo [1] 189/17
bank [9] 208/25
209/12 209/20

B	32/5 32/8 33/9 39/5 45/20 47/5 47/5 52/24 55/13 56/9 57/11 57/12 57/25 58/24 60/22 64/2 72/19 72/22 73/2 73/4 74/1 74/15 77/22 78/7 78/21 79/3 80/10 86/8 89/10 89/19 91/13 94/20 95/12 95/15 95/16 97/10 97/11 98/6 100/6 101/4 102/5 103/25 106/9 107/11 109/5 109/13 109/22 110/7 110/22 114/1 115/2 115/3 115/18 115/19 119/16 120/5 120/9 121/24 124/2 124/12 126/1 127/14 127/16 131/13 131/14 136/15 137/20 137/20 140/9 145/5 145/19 151/1 154/14 160/5 160/7 160/11 161/7 161/9 162/7 163/20 165/2 165/3 165/25 166/10 166/14 167/1 168/16 169/10 170/22 172/6 172/22 174/1 174/4 174/7 177/6 179/1 181/13 182/3 182/3 184/4 184/12 185/11 188/11 189/5 189/6 189/7 189/9 189/21 189/24 191/14 191/24 194/23 195/1 195/14 195/18 199/5	199/13 199/19 204/16 208/7 210/1 213/9 215/13 216/10 216/16 216/19 216/19 216/20 217/9 225/25 229/23 232/16 235/2 235/19 236/5 236/15 237/14 237/21 238/6 238/8 238/9 238/17 239/1 239/11 240/11 240/19 240/25 241/12 241/23 242/3 244/10 244/15 245/1 245/10 245/13 BEACH [1] 1/2 bear [8] 55/20 56/14 57/9 57/10 58/10 63/20 69/25 131/16 bearer [3] 156/20 158/2 158/4 bears [2] 173/10 174/2 because [65] 7/6 8/1 8/10 9/10 14/12 14/17 14/18 28/3 32/4 32/17 58/2 68/18 68/22 69/7 73/11 78/21 90/14 93/17 94/15 101/5 108/3 112/10 121/19 122/2 124/7 124/23 125/9 125/10 128/12 128/21 129/11 129/21 129/24 141/8 141/20 154/2 156/12 156/25 158/13 159/19
USCA11 Case: 22-11150 bank... [6] 210/2	Document: 53-10 Date Filed: 11/30/2022 Page: 142 of 254	
banking [5] 45/5 136/5 136/6 136/13 136/15		
bankrupt [3] 140/25 190/21 221/4		
bankruptcy [2] 220/21 220/21		
bankrupted [2] 8/23 190/23		
bankrupting [1] 221/2		
banned [1] 181/9		
bar [1] 240/16		
based [2] 17/9 202/9		
basically [15] 14/19 24/10 90/23 120/13 149/14 157/22 159/18 160/4 178/10 190/23 199/18 220/17 221/2 221/3 229/16		
basis [7] 19/25 52/21 150/23 164/16 177/13 178/18 232/5		
Bates [8] 26/24 27/2 34/14 118/20 151/13 164/13 166/16 174/17		
BB [1] 1/2		
BDO [1] 99/18		
be [169] 5/19 6/3 7/18 8/17 8/17 9/3 10/24 13/18 15/15 15/17 15/22 31/17		

B

USCA11 Case: 22-11150 because... [25]

Document: 53-10 Date Filed: 11/30/2022 Page: 143 of 254

160/7	162/15	27/7	27/15	28/17	138/16	168/11	
164/25	166/22	46/4	56/23	60/18	178/25	179/2	
176/22	179/5	60/21	60/25	66/3	201/21	202/7	
190/24	191/9	66/4	69/14	74/3	228/25	229/4	
191/21	202/21	75/7	82/9	95/10	232/22	232/23	
204/4	206/8	96/12	96/17	107/14	234/16	239/5	
216/20	220/6	108/20	109/16		240/23	241/16	
224/10	226/20	109/20	110/2		belief [1]	141/14	
228/3	231/21	111/17	113/25		believe [33]	4/16	
237/19	240/22	115/9	125/2	127/13	4/21	5/15	14/18
242/12	242/14	147/14	148/3	148/6	28/18	55/13	58/10
245/2		148/12	148/24		73/13	74/18	78/5
become [3]	187/23	150/1	158/21		83/15	104/16	
189/11	238/10	162/17	168/14		105/16	108/14	
been [56]	16/5	170/8	170/25	171/9	109/7	109/11	
17/19	31/15	172/2	178/12		110/22	123/12	
46/24	47/6	178/23	179/8		126/11	131/12	
57/22	61/5	190/20	199/10		138/19	179/7	
61/17	63/15	204/14	207/13		185/18	187/7	
79/6	83/22	210/3	210/14		188/14	188/25	
109/9	109/10	211/10	211/16		199/17	225/8	229/1
118/19	121/17	217/16	220/25		237/16	237/19	
123/7	141/12	221/15	227/12		241/3	241/14	
151/12	164/13	237/22	245/7		believed [2]	90/16	
164/22	166/11	245/19			189/24		
167/15	168/4	begging [1]	52/25		belonged [2]		
171/13	175/20	beginning [4]	78/25	79/2	145/25	193/9	
178/10	181/9	156/24			below [6]	17/1	
190/24	190/25	begins [3]	125/23		51/5	98/14	198/24
191/15	195/24	125/25	182/24		209/5	223/23	
202/12	208/24	behalf [11]	2/3		Ben [1]	25/22	
209/15	212/19	3/8	3/10	4/9	beneficial [6]		
217/10	217/12	6/21	7/16	12/11	197/19	197/24	
220/20	220/23	166/5	245/22		198/2	198/3	198/5
224/4	227/5	245/25			198/7		
237/9	238/1	behind [5]	65/25		beneficiaries [3]		
238/14	238/19	67/7	67/24	92/5	198/14	198/18	
240/3	241/1	232/21			200/17		
before [65]	1/10	being [25]	20/23		beneficiary [3]		
6/1	15/6	29/23	74/23	90/4	20/21	21/1	161/8
24/6	24/8	90/5	100/4	116/3	Benjamin [1]	24/20	
		128/18	128/22		beside [2]	88/9	
		129/4	137/19		237/12		
					best [12]	17/9	

B	billionaire [4] 229/23 237/3 244/24 245/1	168/23 169/7 169/13 169/20 171/22 172/6 172/8
best... [11] 17/12 46/24 47/6 49/15 68/5 83/18 128/17 129/14 129/22 209/21 224/23	billions [1] 102/5 binary [1] 124/20 binding [1] 108/4 biometric [1] 216/20	172/10 172/16 172/17 172/18 172/19 172/20 172/22 173/8 173/16 174/1
BETH [1] 1/10 better [2] 5/18 70/13	birthday [3] 55/25 55/25 195/24	174/14 176/14 176/24 177/6
between [48] 7/19 9/17 14/24 24/19 31/5 40/20 46/16 47/10 50/20 51/15 56/23 58/16 61/25 70/9 74/19 76/25 100/20 121/5 121/9 121/10 122/8 122/22 123/1 125/8 128/16 132/20 136/9 137/17 138/1 140/4 146/12 147/7 165/4 171/23 174/22 174/24 181/20 195/1 195/14 196/15 199/6 203/3 203/18 204/22 210/24 212/15 221/20 234/9	Biscayne [1] 1/14 bit [11] 6/7 21/17 29/18 56/9 57/9 139/20 140/4 162/5 201/17 213/11 219/25	Bitmessages [12] 116/3 116/6 163/9 163/19 164/11 165/2 165/20 165/23 167/1 167/4 171/23 174/15
beyond [1] 134/14 bias [1] 239/16	Bitcoin [260] Bitcoin-general [1] 65/10	Black [1] 212/25 blamed [2] 232/16 232/17
bifurcate [4] 238/21 238/22 242/25 243/9	Bitcoin-related [3] 122/8 122/19 123/1	blank [2] 14/16 15/6
bifurcating [1] 239/23	Bitcoin.org [11] 90/21 91/21 91/24 91/25 92/7 92/15 92/20 92/23 93/2 93/2 93/16	block [10] 56/21 57/1 57/18 57/19 57/25 58/1 58/5 58/5 94/8 103/18
big [5] 51/25 52/2 135/25 137/21 201/23	Bitcoin.org/forums [1] 92/23	blockchain [5] 10/20 10/25 57/19 58/5 200/21
Bill [2] 174/9 174/10	Bitcoins [4] 17/22 18/5 18/18 147/8	blocks [3] 149/16 155/24 159/8
billion [2] 9/13 9/14	Bitcointalk [12] 90/19 90/20 90/21 90/22 91/9 91/22 91/22 91/23 92/4 92/18 92/21 92/22	blog [24] 80/4 80/6 80/8 80/14 80/22 80/23 82/11 82/20 82/21 83/7 83/10 83/11 83/13 83/14 83/15 83/20 85/17 85/19 86/2 86/2 86/5 86/6 87/21 88/5
	Bitcointalk's [1] 92/11	blogs [1] 83/24 BLOOM [1] 1/10
	Bitmessage [32] 116/10 116/15 117/7 118/3 118/17 118/18 162/23 163/22 164/6 168/22 168/23	blurry [1] 168/24 Bob [1] 174/7 body [2] 20/15

B

USCA11 Case: 22-11150 Document 30-1 Date Filed: 13/30/2022 Page: 145 of 254
body... [1] 185/17
BOIES [1] 1/15
Bold [1] 196/13
book [1] 136/20
books [1] 78/15
boss [1] 70/15
Bot [1] 161/8
both [22] 3/6 25/7
30/17 30/24 38/23
42/12 63/13 73/23
93/20 94/20 94/20
127/7 149/15
172/13 179/24
217/25 219/1 219/4
224/4 224/22 240/1
240/3
bottom [46] 9/22
10/1 13/9 14/2
15/25 17/5 17/16
17/17 25/18 26/23
26/24 26/24 29/12
32/23 34/14 34/22
39/2 51/17 58/18
59/8 59/12 59/18
59/19 77/12 82/13
100/24 103/10
104/10 113/5
116/19 118/20
120/8 136/23
139/21 152/15
170/7 173/10
173/19 174/18
179/14 199/1
205/16 205/19
205/21 214/5
225/19
bought [3] 204/4
204/12 220/1
Boulevard [1] 1/21
bow [1] 81/19
box [2] 15/9 15/23
brackets [1]

173/17
branches [1] 136/13
breach [1] 141/13
breached [1]
141/11
break [9] 5/22
58/4 60/10 60/25
96/1 107/2 110/2
162/7 162/9
Brendan [2] 74/19
108/8
BRENNER [4] 1/16
3/21 167/16 168/7
bring [113] 4/16
5/25 11/23 12/15
16/11 17/15 20/10
22/14 31/2 31/7
32/6 33/11 34/6
35/6 35/11 36/23
38/12 39/1 40/13
40/24 41/24 43/14
46/2 46/14 48/9
49/6 50/8 51/12
51/13 54/7 57/14
58/12 60/18 63/16
64/6 66/8 67/21
68/12 70/6 76/19
80/24 81/23 85/23
96/23 97/3 98/8
100/21 103/2 103/7
104/6 105/13
107/14 109/16
109/19 112/15
114/20 116/12
117/23 119/12
130/2 130/8 136/18
136/21 138/18
142/12 142/25
143/1 144/7 144/15
146/5 148/16
150/14 153/21
160/16 168/12
168/18 172/24
176/6 179/6 179/10
180/22 183/3
182/1 184/2
185/22 186/7
186/12 191/11
192/14 194/6 194/7
196/2 198/10
198/12 203/16
204/1 204/19
210/15 211/24
212/12 214/20
215/2 217/21
221/17 223/2
224/17 225/6 228/5
233/3 233/8 234/5
235/12 242/11
bringing [1]
179/18
British [1] 79/21
broke [1] 141/16
broken [4] 74/22
80/5 80/21 81/16
Brooks [2] 233/7
234/9
brother [3] 50/21
77/20 77/21
brought [2] 9/6
122/15
Buddy [1] 93/11
build [2] 9/4
135/15
building [2] 236/5
236/6
built [3] 8/13
95/5 100/4
bunch [1] 223/22
business [4] 49/15
94/23 195/8 221/7
busy [1] 218/23
buying [1] 211/22

C

Cable [1] 155/18
Caley [5] 232/22
234/1 234/9 234/25

C

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 146 of 254
Caley... [1] 235/1
call [17] 3/1 3/12
4/24 21/3 21/5
36/16 52/2 57/12
74/21 97/4 123/10
174/7 174/10
183/15 196/24
197/20 209/3
called [24] 16/18
20/22 24/11 24/20
34/3 45/3 63/21
70/25 71/4 71/15
94/16 118/5 118/10
135/18 155/12
181/7 181/8 182/6
182/23 191/2
199/19 204/15
210/18 222/9
Calling [1] 3/14
Calls [2] 175/9
193/10
Calvin [2] 113/13
160/2
came [11] 40/11
42/11 42/22 69/4
118/22 122/2
145/12 179/3
179/24 180/4 225/4
can [416]
can't [37] 8/20
24/2 24/11 34/20
35/15 38/8 44/6
47/14 48/15 53/24
53/25 56/1 58/1
58/11 58/25 63/15
71/22 95/16 123/6
124/7 124/23 127/8
136/14 155/17
162/1 166/24
168/24 169/3 169/8
170/22 171/20
187/7 191/21

202/17 215/8 231/2
242/20 243/15
cannot [4] 78/16
169/21 186/10
209/12
capacity [1] 42/19
capital [3] 135/12
135/13 135/14
capitalists [1]
135/19
capitalize [1]
160/6
capitalizing [1]
139/15
caps [6] 51/21
51/23 52/11 52/17
53/2 101/8
caption [1] 182/21
card [1] 212/25
care [1] 79/11
careful [1] 168/11
Carter [1] 12/2
case [63] 1/2 3/12
3/14 5/3 5/9 5/21
6/24 15/16 28/17
30/3 31/16 41/9
79/19 92/25 107/15
107/24 108/5 108/7
108/19 109/5
110/21 113/21
145/17 150/11
162/18 166/7 178/3
178/9 178/12
178/23 180/16
182/21 203/25
217/5 220/20
220/23 220/25
221/1 236/1 236/2
236/24 237/10
237/17 238/5
238/15 238/19
240/15 240/19
241/20 242/4
242/10 242/15
243/1 243/7 243/11
243/24 244/9
244/10 244/13
244/17 245/6
cases [7] 4/20
107/17 107/19
108/3 108/4 108/18
243/12
casino [2] 159/20
159/21
casinos [1] 159/19
categorically [1]
216/23
cause [1] 237/21
cc [4] 21/19
187/18 223/9
223/11
cc'd [1] 189/7
ceased [1] 72/19
cent [1] 136/10
centers [1] 155/16
cents [1] 188/3
CEO [4] 100/8
161/18 161/19
161/20
certain [8] 32/24
33/15 33/24 73/23
165/16 241/2
243/14 244/5
certainly [18]
60/11 65/25 105/2
108/19 108/22
117/19 126/6
174/23 229/6
238/17 239/25
240/11 240/17
240/17 241/15
243/17 244/6
244/19
Certificate [1]
2/2
Certified [1]
247/5

C

USCA11 Case: 22-11150 Document: 53-10 [1] Date Filed: 11/30/2022
certify [2] 247/7
247/12
cetera [6] 10/6
94/18 124/4 124/20
159/23 184/8
CFO [2] 16/3
216/10
chain [6] 51/15
132/20 205/13
207/24 210/13
211/15
challenging [2]
120/1 191/20
change [15] 90/13
102/4 136/12
171/15 174/5 174/5
174/8 176/13
176/15 176/15
176/16 176/16
176/16 176/18
192/19
changed [6] 84/2
121/17 121/24
122/1 128/15
140/22
changes [2] 121/25
157/5
channel [3] 63/22
64/4 160/25
character [2] 33/7
114/8
characterization
[3] 149/21 232/25
238/14
charter [4] 45/5
136/5 136/13
136/15
chased [1] 170/20
chat [3] 124/2
124/3 124/6
check [1] 10/20
checkbook [2]

94/22 94/24
checked [3] 10 [1] 150/9
Chesher [11] 12/10
12/23 16/3 16/18
17/17 17/19 37/3
37/18 100/16
155/15 216/15
Chris [1] 155/17
Christ [1] 70/1
chronology [2]
19/16 22/17
church [1] 9/3
circle [1] 53/13
Circuit [5] 107/19
107/21 107/23
108/4 108/5
circumstance [1]
5/18
circumstances [6]
5/17 224/3 224/9
224/21 241/4
243/22
circumstantial [1]
108/23
citation [7] 37/13
37/16 62/12 91/2
91/3 157/12 227/1
cite [1] 107/22
cited [1] 108/14
cites [1] 37/2
city [2] 5/4 108/1
Civil [3] 3/14 5/4
107/25
claim [20] 42/3
110/15 111/17
141/3 141/6 141/15
145/24 155/7
155/10 177/19
217/1 217/2 229/23
236/24 236/25
237/4 237/9 237/13
238/11 238/23
claimed [7] 111/19
148/2 149/3 155/11

179/22 229/8 238/8
claiming [6] 33/25
34/1 79/5 93/19
95/7 108/12
claims [6] 237/18
237/22 237/23
238/25 240/5
243/14
clarification [1]
60/2
clarify [5] 131/10
131/15 147/6
164/25 168/6
classified [1]
55/13
clear [5] 89/19
98/4 166/14 167/1
238/23
click [1] 29/7
client [12] 4/1
16/14 55/17 56/11
63/14 65/13 65/17
123/22 124/3 125/4
174/22 212/24
clip [18] 72/9
89/13 89/16 90/10
91/8 105/9 106/4
123/18 125/3
126/17 128/3
128/24 129/16
156/1 224/12 228/4
231/3 231/22
close [7] 121/1
129/23 220/25
225/4 240/14
240/15 242/3
closed [3] 79/18
85/21 220/23
closing [1] 141/20
Cloudcroft [1]
34/5
CLR [1] 247/17
co [4] 54/3 61/1
67/20 68/16

C

co-counsel [1]	232/24 commented [1] 17/19 comment [5] 17/13 17/14 198/20 233/18 239/18 commenting [1] 233/7 comments [1] 237/3 commercial [2] 107/20 136/6 committee [2] 100/18 216/18 common [1] 21/3 Commonwealth [2] 213/15 215/12 communicate [2] 123/8 174/13 communicated [1] 174/15 communication [11] 14/24 53/12 56/13 56/14 76/24 100/19 116/6 124/18 127/7 129/24 174/23 communications [16] 49/25 53/8 76/17 87/10 87/16 98/2 98/4 112/20 113/21 114/4 114/17 122/19 126/22 134/11 165/3 174/21 community [3] 69/24 92/25 99/16 companies [42] 12/12 16/19 17/1 27/5 39/21 39/23 40/1 40/5 40/19 97/18 99/15 100/5 121/22 135/10 138/14 138/15 141/1 155/20 155/20 155/21 155/22 157/7	158/11 158/20 177/23 177/23 177/24 178/1 178/1 178/3 181/9 181/14 191/3 193/18 200/16 206/17 208/8 218/20 218/21 218/21 220/16 221/8 company [84] 6/22 8/15 11/14 11/17 12/6 14/5 14/19 15/6 15/9 15/10 15/11 15/15 15/20 15/21 19/21 21/20 23/2 34/4 38/10 45/3 47/16 78/15 95/17 97/16 100/7 102/23 106/10 107/20 110/8 121/20 121/21 122/2 128/15 135/12 135/18 138/16 148/7 153/10 153/11 155/12 156/7 156/7 156/11 157/8 158/10 161/18 161/21 161/24 177/21 181/16 190/3 193/19 195/8 199/18 201/1 201/1 201/24 203/24 204/12 204/15 205/25 206/3 206/14 206/20 206/23 207/9 208/24 209/16 211/5 211/22 215/23 216/4 216/24 217/10 217/13 218/19 218/19 218/22 219/18 219/19
----------------	---	---

CUSCA11 Case: 22-11150
Company... [4]

220/25 221/14

221/24 222/9

company's [3]

147/16 156/17

212/19

compared [1] 111/8

compensatories [1]

238/22

compensatory [1]

243/13

compile [1] 124/15

compiled [1]

124/12

complete [8] 5/13

9/5 70/2 93/5

124/1 127/14 209/3

247/10

completed [2]

78/15 210/1

completely [8] 9/1

14/16 93/12 101/4

124/17 132/13

211/21 228/4

completeness [2]

91/11 229/4

completes [1]

124/1

completion [1]

149/17

complex [3] 124/19

158/16 158/16

compliance [4]

150/17 151/9

151/23 152/2

complicated [1]

27/25

compromised [2]

178/24 204/23

computer [14]

23/25 24/1 24/2

24/4 24/6 27/4

27/6 34/17 34/19

100/4 102/2 123/22

124/11 150/8 175/3

computers [12]

8/13 27/5 34/18

34/18 150/8 155/16

155/23 174/19

175/1 175/14

175/17 176/1

concede [1] 147/22**conceded [1]**

147/21

concept [1] 240/17**concern [5]** 187/18

242/12 242/14

244/18 244/20

concerned [1]

114/3

concerning [3]

40/1 135/6 136/24

conclude [1] 228/8**concluded [2]**

230/11 246/4

conclusion [1]

175/10

conditions [2]

199/15 203/5

conduct [1] 236/3**confidential [2]**

238/6 242/18

confirm [4] 28/20

46/9 50/9 209/13

confirmed [1] 62/1**confirms [1]**

147/23

conflating [3]

11/11 91/21 199/20

conflicting [1]

126/5

confounding [6]

129/7 130/1 137/17

200/25 201/17

202/21

confused [2]

170/13 170/15

confuse [14] of 254/24

Confusing [2]

19/24 20/1

conjunction [1]

94/6

connect [1] 225/23**connection [2]**

164/17 203/21

connections [1]

155/21

Conrad [1] 12/2**consider [4]** 243/3

243/12 244/12

244/12

considering [1]

14/12

consistent [1]

18/6

constructed [3]

92/4 92/13 190/21

constructive [1]

240/5

consultant [1]

234/1

consultants [1]

231/8

consulting [1]

233/2

contact [6] 16/14

25/22 26/2 77/17

147/2 209/4

contacts [1]

233/22

contain [1] 184/17**contained [2]**

138/12 144/3

contains [6] 153/7

165/6 186/17

210/13 242/19

247/12

contend [1] 206/10**contention [1]**

160/12

C

USCA11 Case: 22-11150 Document Date Filed: 11/30/2022 Page: 150 of 254
context [5] 21/20
182/2 199/11
228/24 229/4
continents [1]
175/2
continue [9] 6/10
28/9 60/23 104/18
109/24 168/16
173/5 174/25
208/15
CONTINUED [2] 2/5
6/13
continuing [1]
144/22
contract [1]
159/16
contributed [4]
40/9 42/4 179/22
241/11
control [29] 11/8
11/10 75/16 75/17
75/19 88/5 117/6
117/13 156/10
156/17 158/10
174/1 175/7 177/6
177/22 178/1
178/11 178/12
190/23 201/4 201/5
220/13 221/4
222/13 224/2 224/9
224/20 226/6
231/21
controlled [9]
11/15 79/17 86/6
156/15 156/20
158/6 221/8 221/10
221/22
controller [1]
158/17
controls [3] 14/6
177/20 177/21
Controversy [1]

131/25
conversation [6]
17/10 37/3 37/18
37/22 74/19 74/20
conversations [1]
37/14
conversion [1]
240/5
conveyed [1] 225/2
convoluted [9]
156/20 156/22
156/23 157/4 158/5
158/7 158/13
158/15 238/11
cool [1] 78/7
coordinate [1]
231/8
copied [2] 15/22
203/14
copies [1] 113/6
copy [25] 55/23
55/24 55/25 56/1
56/4 56/4 65/5
127/7 183/19 186/3
186/5 186/8 189/8
189/9 192/10
194/15 194/16
194/17 194/17
194/17 194/20
194/21 195/22
197/8 208/25
Coral [1] 1/22
corner [2] 213/8
213/16
corner's [1]
215/21
corporate [5]
98/17 100/5 128/14
158/19 216/9
corporation [7]
23/23 108/6 121/18
199/22 201/22
202/7 202/13
correct [155] 6/21
6/22 7/11 12/12
10/13 14/6 15/19
19/23 20/21 23/11
30/25 31/1 33/16
34/1 36/1 38/24
38/25 39/24 40/11
43/19 44/17 44/18
45/2 45/9 45/10
45/13 48/6 50/3
50/7 57/24 61/1
62/2 63/11 64/1
65/14 65/15 66/1
68/10 72/20 75/18
75/22 76/9 76/15
78/4 79/1 80/13
81/8 81/19 82/3
82/10 82/19 85/12
85/13 87/3 88/10
88/13 89/20 92/17
93/21 93/24 94/1
96/21 97/23 98/16
99/13 102/10 104/4
104/10 106/23
111/5 111/23
113/14 114/15
118/24 121/6 123/5
123/9 123/25 125/9
125/10 128/22
128/23 129/22
131/13 134/7
138/10 138/11
140/17 143/25
145/18 145/21
147/3 147/12 149/4
149/5 154/18 155/2
155/8 156/5 159/14
160/14 161/1 161/2
172/19 172/22
173/11 173/12
173/17 174/2 174/3
175/8 175/15
175/18 175/25
177/7 177/20 178/1
178/4 183/1 183/11

C

USCA11 Case: 22-11150 Correct... [35]	123/7 124/13 124/14 125/15 131/8 135/6 136/7 136/10 136/24 137/9 137/14 137/14 148/4 160/6 162/21 164/14 166/2 168/18 174/4 174/7 174/8 176/3 176/14 176/14 176/15 176/16 179/6 181/15 181/17 201/4 204/12 216/9 220/5 226/20 226/21 228/5 230/10 230/13 230/16 232/3 239/25 correctly [2] 39/14 105/19 correspondences [1] 217/17 corridor [1] 136/9 cosigned [1] 216/16 cosigner [1] 216/19 cost [3] 10/12 136/9 208/8 Costa [1] 219/16 could [79] 16/7 22/13 23/24 26/17 31/7 33/11 35/11 40/24 43/14 58/2 58/24 62/17 64/2 70/14 74/22 82/22 84/5 88/6 90/1 91/2 92/8 92/18 93/25 94/13 94/17 94/18 94/21 94/24 95/1 95/4 95/6 102/22 111/17 112/11 114/3 119/16 122/3 122/3	175/2 229/14 222/17 231/18 country [5] 21/6 21/7 229/9 229/20 229/21 County [1] 107/20 couple [3] 49/18 55/14 171/19 course [5] 4/14 10/20 135/19 239/22 245/8 court [63] 1/1 1/23 1/23 3/1 6/12 43/12 43/18 47/10 47/11 74/8 75/9 107/1 107/21 107/25 108/4 108/16 108/20 couldn't [6] 128/8 141/12 154/19 201/6 220/17 221/4 counsel [45] 3/16 3/17 3/25 21/13 24/17 32/8 40/14 58/13 59/2 62/8 63/17 64/7 66/9 67/20 71/10 76/20 80/19 84/3 85/24 89/22 90/25 98/9 100/22 104/23 112/16 116/13 122/6 125/12 130/9 132/18 148/15 149/7 150/14 150/25 157/9 172/25 180/23 191/11 194/10 204/19 210/16 221/18 223/3 233/4 236/11 counter [1] 221/7 counter-party [1] 221/7 countries [4]	175/2 229/14 222/17 231/18 country [5] 21/6 21/7 229/9 229/20 229/21 County [1] 107/20 couple [3] 49/18 55/14 171/19 course [5] 4/14 10/20 135/19 239/22 245/8 court [63] 1/1 1/23 1/23 3/1 6/12 43/12 43/18 47/10 47/11 74/8 75/9 107/1 107/21 107/25 108/4 108/16 108/20 couldn't [6] 128/8 141/12 154/19 201/6 220/17 221/4 counsel [45] 3/16 3/17 3/25 21/13 24/17 32/8 40/14 58/13 59/2 62/8 63/17 64/7 66/9 67/20 71/10 76/20 80/19 84/3 85/24 89/22 90/25 98/9 100/22 104/23 112/16 116/13 122/6 125/12 130/9 132/18 148/15 149/7 150/14 150/25 157/9 172/25 180/23 191/11 194/10 204/19 210/16 221/18 223/3 233/4 236/11 counter [1] 221/7 counter-party [1] 221/7 countries [4]
--	---	---	---

C

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 15 of 254
Court's... [1]
 227/8
courtroom [3]
 236/3 236/5 242/13
covenants [1]
 137/19
cover [4] 13/25
 40/21 187/13 190/8
covered [1] 6/19
Cowangarra [1]
 189/17
crack [1] 167/13
Cracked [3] 80/4
 80/21 81/15
CRAIG [68] 1/7 2/4
 4/5 10/13 16/23
 17/22 17/25 18/1
 18/3 18/5 18/8
 18/9 18/10 22/17
 26/1 34/4 37/3
 37/22 38/1 38/3
 47/19 71/1 71/15
 77/20 81/21 84/4
 91/1 106/13 108/10
 108/25 113/11
 117/25 125/13
 136/20 149/16
 149/17 150/4
 151/21 151/23
 157/5 164/7 168/25
 169/1 169/8 171/1
 172/6 182/4 182/4
 182/5 182/6 182/18
 182/23 182/24
 185/17 187/18
 187/24 188/6
 188/24 189/12
 189/16 206/2 208/3
 208/23 209/19
 210/7 227/25
 233/11 234/2
Craig S. Wright [1]
 113/11

craig.wright [2]

45/19 67/1
Craigs [1] 234/3
crazy [1] 100/11
create [2] 44/17
 229/14
created [11] 18/17
 19/2 45/20 54/3
 61/1 68/16 94/11
 121/11 170/8
 201/15 217/1
creates [1] 124/3
creating [1] 78/7
creation [4] 44/21
 94/4 137/9 238/15
creator [2] 45/15
 170/6
creators [1] 45/16
credit [2] 156/18
 212/25
credits [2] 33/24
 35/2
crime [1] 8/17
criminals [1] 9/2
critical [1] 69/8
cross [2] 5/12
 122/18
cross-examine [1]
 5/12
cross-examining [1]
 122/18
CRR [1] 247/17
crud [1] 70/13
crypto [5] 71/4
 71/16 73/5 74/12
 201/24
cryptocurrencies [1] 29/25
cryptographic [2]
 199/10 202/8
cryptography [2]
 55/11 76/13
CSR [1] 247/17
CSW [11] 22/18

64/1 64/3 64/9

106/10 106/13

106/16 106/22

106/23 106/24

110/8

currently [1]

177/19

cut [1] 102/15

cv [1] 1/2

D

D359 [4] 130/3

130/8 167/21 168/3

D539 [1] 131/4

DAC [6] 199/21

201/21 201/21

202/7 202/9 202/13

DAC.digital [1]

199/18

Dale [1] 103/19

Dallas [1] 107/20

damage [1] 238/4

damages [18]

236/24 236/25

237/4 237/13

237/16 238/23

239/6 240/1 240/6

240/7 240/10

241/12 241/16

242/1 243/13

243/14 244/12

245/2

damn [1] 220/24

danger [1] 240/18

data [7] 114/2

124/23 130/25

131/24 132/6

132/13 155/16

date [18] 24/3

24/11 38/9 159/2

191/22 192/4

192/20 192/25

207/9 213/18

213/20 216/1 216/1

D

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 153 of 254
date... [5] 217/15
218/8 218/11 222/9
227/22
date's [1] 191/15
dated [14] 81/2
86/4 99/6 101/3
152/3 183/17
183/22 183/25
186/1 186/17
188/23 190/11
195/18 201/13
dates [1] 56/13
dave [284]
Dave's [28] 7/9
44/13 66/4 66/6
66/12 72/22 77/20
78/21 79/15 80/1
80/11 82/14 83/8
84/25 86/22 87/19
96/12 116/10
122/15 123/12
123/21 124/5 127/6
139/16 145/25
220/12 221/6
222/25
David [10] 1/4
39/14 78/7 189/6
199/25 224/3 224/3
224/21 237/11
240/8
day [21] 1/9 20/14
55/21 69/4 94/15
102/4 121/17
147/14 147/14
147/15 147/18
167/14 176/21
195/24 207/5 208/3
218/23 230/6
235/20 247/9
247/15
days [8] 77/17
80/1 80/7 82/2

83/18 87/18 95/24
160/1
de [1] 1/21
deadline [1] 243/4
deal [3] 97/11
115/3 115/18
deals [1] 5/4
Dear [4] 206/2
208/3 208/23
209/19
death [3] 139/16
220/12 221/6
decades [2] 8/9
161/8
deceased [5] 80/8
82/2 225/22 239/9
241/18
decedent [1] 165/4
December [9] 10/6
56/4 69/1 91/19
148/3 148/6 148/12
148/24 150/1
decide [2] 239/15
240/6
decided [3] 56/25
56/25 243/2
decision [18] 5/8
32/13 34/3 34/23
35/19 35/24 36/3
36/13 36/19 40/17
41/8 41/19 41/20
75/8 99/13 102/10
144/18 145/1
decisions [6]
33/23 35/1 38/15
40/7 98/5 98/6
declaration [12]
4/21 43/11 180/25
182/18 182/23
183/17 183/19
185/24 186/1 186/2
187/6 196/19
declare [2] 182/24
183/10

deed [10] 103/4
104/4 186/15
194/23 194/24
195/1 195/14 199/6
203/3 220/6
DEF [1] 165/15
defecate [1] 102/6
defend [2] 167/13
168/10
Defendant [19] 1/8
1/19 3/10 60/20
117/6 117/8 117/9
150/4 164/10
164/11 165/3 165/4
165/8 165/17
165/18 236/25
237/2 242/21
245/25
Defendant's [5]
108/19 131/18
165/20 167/17
167/18
Defendants [3]
3/11 107/24 238/16
defending [1]
244/17
Defense [14] 1/4
18/16 19/22 23/4
27/2 45/4 109/17
118/21 151/19
155/12 159/15
161/19 240/4 240/8
define [2] 21/6
21/7
defrauded [1]
218/20
degrees [2] 8/24
8/24
delay [4] 3/2 6/5
6/8 171/14
delete [10] 52/4
52/13 53/3 87/21
93/10 123/6 124/7
128/6 128/14 132/6

D

deleted [4] 93/3 95/16 124/8 127/5	90/25 104/23 106/2 122/16 125/3 125/12 125/21 128/3 128/25 129/17 134/22 156/2 163/14 163/17 224/13 228/4 231/4 231/23	136/1 136/25 devices [3] 118/25 242/11 242/12 DEVIN [1] 1/13 did [156] 6/21 7/17 7/23 7/24 8/24 10/13 12/6 15/10 15/12 20/7 23/16 23/17 23/18 23/21 24/1 24/9 24/13 26/1 28/15 30/12 30/15 30/18 32/16 32/20 33/23 38/6 38/17 39/5 39/7 39/12 39/21 41/2 43/22 43/25 46/23 49/4 50/2 50/4 52/6 53/2 55/8 55/18 56/10 65/22 67/11 74/8 75/2 75/5 76/1 76/3 76/6 78/20 79/3 85/12 85/13 88/3 88/15 88/18 89/5 89/7 89/8 92/19 93/15 95/7 96/10 96/22 102/13 102/14 102/15 102/21 106/20 107/14 108/4 108/5 109/3 111/25 112/1 120/14 120/16 122/8 122/19 122/22 126/22 127/22 128/6 128/14 128/17 128/21 129/3 129/22 130/6 130/7 133/6 133/8 134/6 135/5 135/22 135/22 136/23 137/8 137/14 137/14 137/19 137/20 138/13
demonstrate [1] 193/2	depositions [1] 232/13	
demonstrated [2] 7/25 140/20	Des [2] 14/21 32/3	
DeMorgan [6] 99/17 121/25 214/6 214/7 214/7 216/10	describe [1] 180/14	
demorgan.com.au [1] 113/13	describing [1] 221/21	
denied [5] 33/15 33/20 38/24 38/25 96/7	deserve [1] 156/18	
Denis [18] 158/3 158/11 204/22 205/14 205/14 205/18 205/21 205/22 206/6 208/2 209/5 209/19 209/21 209/25 210/10 210/25 211/16 212/15	design [6] 23/25 24/2 24/6 24/6 24/12 123/2	
Denis's [1] 205/22	designed [3] 24/1 24/4 58/1	
Dennis's [1] 208/8	desire [1] 164/19	
denying [3] 31/24 44/16 164/2	despite [2] 44/15 69/2	
departments [1] 44/24	destroy [3] 124/22 132/13 141/1	
Depends [1] 21/6	detail [1] 29/17	
deposition [33] 6/24 57/11 62/8 63/3 84/3 84/13 84/14 85/15 85/20 85/22 88/21 88/23 89/7 89/22 90/15	detailed [1] 199/10	
	details [14] 209/1 209/2 209/4 209/12 209/20 209/21	
	211/5 211/17 212/21 214/5 214/12 214/17 215/23 231/17	
	determination [1] 109/2	
	determine [1] 5/12	
	develop [1] 160/2	
	developed [1] 124/11	
	development [5] 36/14 135/7 135/10	

D

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 125 of 254
dia... [51] 138/17
 140/6 142/10
 142/11 143/6 145/5
 147/22 148/9
 148/10 148/11
 155/9 155/10
 155/10 155/24
 156/16 156/16
 156/18 158/12
 160/13 161/17
 161/23 163/3
 165/17 165/19
 167/23 170/17
 174/13 178/25
 189/7 189/8 192/9
 193/21 194/14
 194/21 195/21
 195/23 195/25
 216/8 220/18
 220/24 221/8
 221/11 222/25
 223/1 224/10
 224/11 225/3
 229/16 230/25
 231/14 232/19
didn't [68] 7/4
 11/14 19/11 23/24
 23/25 26/17 28/14
 34/19 34/19 38/6
 44/20 44/22 50/5
 50/7 51/20 51/21
 51/22 52/1 52/5
 56/3 57/12 65/15
 68/11 68/11 68/22
 68/24 69/3 75/25
 79/2 82/11 84/1
 90/22 92/5 92/12
 94/8 94/11 95/4
 95/9 96/14 105/18
 105/19 105/23
 105/24 105/25
 112/10 122/23

129/5 129/25
 134/12 138/16
 145/13 155/23
 161/25 162/3
 162/14 163/7 170/9
 184/22 193/9
 193/17 207/8 220/6
 221/2 221/13 226/1
 231/15 231/20
 242/11
died [17] 27/15
 27/19 49/18 70/3
 70/5 70/5 70/17
 72/19 73/15 83/18
 111/17 172/2
 192/22 204/14
 221/15 222/25
 224/10
dies [8] 12/3
 20/13 22/21 80/2
 87/19 201/8 203/11
 222/10
difference [5]
 128/16 137/17
 137/19 137/21
 181/20
Differences [1]
 56/23
different [34]
 11/3 11/10 12/13
 15/13 20/7 38/19
 38/19 43/21 54/25
 56/16 56/17 91/20
 93/9 106/15 106/20
 118/25 124/8
 126/10 129/6
 155/16 172/12
 177/3 181/21
 184/19 184/20
 198/8 211/9 211/11
 211/19 211/21
 227/20 228/4
 230/21 231/19
differently [2]

55/7 244/10
difficult [12] 45/20 158/18
digital [4] 15/22
 132/13 181/13
 229/14
direct [9] 2/5
 6/10 6/13 26/2
 53/10 230/11
 240/18 242/1
 242/18
directed [1]
 238/17
directly [3] 11/15
 175/21 243/23
director [2] 68/23
 225/22
directors [5]
 94/25 100/10
 100/17 181/13
 215/11
dirty [1] 220/24
disagree [3] 14/25
 48/7 56/8
disappearing [1]
 10/18
disappears [1]
 9/10
disclosed [1] 74/1
disclosure [1]
 227/19
disconnect [1]
 126/9
discount [2] 208/7
 209/15
discovered [1]
 53/23
discovery [8] 57/7
 117/6 118/24
 163/25 166/24
 175/7 192/17
 239/23
discredited [1]
 140/19

D

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 156 of 254

discuss [12]	98/16 99/8 99/20 99/23 99/24 100/1 100/3 162/16 221/11 221/13 223/9 235/25	13/6 13/15 19/2 19/14 26/20 26/21 26/23 31/25 32/2 32/13 32/15 32/15 33/2 34/2 34/13 34/15 35/3 36/24 38/18 39/9 39/15 41/4 41/25 42/3 42/6 42/7 43/25 44/6 57/6 58/25 61/3 61/6 61/20 67/21 71/13 83/20 83/21 84/1 97/20 97/23 102/25 103/4 104/12 104/17 104/19 105/17 105/19 105/23 105/24 106/1 110/12 110/16 110/18 110/20 110/25 118/16 119/5 120/1 120/12 120/14 120/15 130/25 141/2 141/2 151/12 162/16 162/18 162/22 164/8 164/12 166/7 167/2 170/1 173/4 174/1 174/18 175/24 177/6 177/12 179/19 180/9 181/22 183/4 183/17 183/19 183/22 183/25 184/10 184/20 186/1 186/3 186/9 187/5 187/7 187/8 187/10 189/24 190/3 190/14 190/16 190/18 191/10 191/20 192/2 192/7 192/18 193/2 193/16 193/17 193/21	193/25 194/7 194/1 194/15 195/22 196/1 197/2 197/11 199/1 199/4 199/8 200/3 200/7 200/15 201/10 201/19 201/20 202/24 203/2 203/6 203/13 203/23 204/5 207/15 207/17 207/19 211/11 212/4 212/8 215/9 215/9 216/18 217/13 225/25 226/1 234/24 235/2
discussed [6]	16/23 56/19 98/17 98/19 134/8 221/15	documented [1] 217/8	
discussing [4]	7/9 65/6 125/8 234/12	documents [42] 6/21 7/8 7/23 13/16 14/22 15/24 17/20 18/22 31/15 32/16 34/12 38/10 40/8 44/13 48/4 84/2 110/13 120/19 121/9 122/1 122/19 123/5 140/20 140/22 141/7 164/17 165/14 166/8 166/23 175/6 175/14 175/17 178/23 179/3 180/14 180/19 193/1 194/6 213/3 215/17 216/24 226/7	
discussion [1]	99/21	dodgy [2] 219/11 219/12	
disparity [2]	239/9 241/17	does [33] 8/16 8/17 11/1 13/3	
display [3]	176/19 176/19 176/20	15/22 18/10 18/10 18/13 18/21 19/2	
disputing [1]	202/19	36/2 60/2 64/9 89/9 97/18 101/11	
distance [3]	87/10 87/15 170/19	101/12 104/18	
distant [1]	121/2		
distributed [8]	54/24 55/2 55/4 55/6 199/21 201/21 202/7 202/13		
distribution [1]	202/10		
distributions [1]	57/5		
district [9]	1/1 1/1 1/10 1/23 107/24 108/3 247/3 247/6 247/7		
dive [1]	132/11		
DIVISION [1]	1/2		
DK [1]	64/11		
do [413]			
Docket [2]	148/16 150/14		
document [150]	9/18 10/5 10/15		

D

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 153 of 254
does... [15] 119/5
120/6 120/7 123/11
128/10 147/24
147/25 153/4 156/6
161/23 172/7
184/17 208/4
233/25 238/19
doesn't [38] 15/20
17/20 17/21 18/12
18/20 27/8 32/15
34/11 38/17 53/25
58/4 68/6 74/1
97/25 99/23 129/20
129/23 161/25
169/13 169/13
169/14 169/19
173/14 176/22
177/12 198/2 198/7
206/9 211/10
214/10 214/15
214/16 215/14
219/14 219/17
227/19 233/11
241/3
doing [21] 9/23
10/4 29/23 30/6
30/7 30/17 48/6
69/2 69/4 93/12
99/9 135/15 156/14
161/25 162/8
172/14 199/20
218/17 220/15
225/4 231/20
Dolevski [1]
225/14
dollar [2] 8/20
213/2
dollars [8] 8/21
188/3 208/3 210/3
210/6 213/21 214/9
214/14
domain [5] 92/3

92/11 121/24
170/14 170/16
don't [108] 8/7
8/18 8/18 18/1
20/18 24/24 24/24
25/21 25/21 26/11
26/13 26/21 33/1
33/17 33/19 33/20
33/20 33/22 34/12
46/8 47/18 52/2
52/9 55/21 56/3
58/9 63/18 64/2
64/23 69/8 71/6
71/9 71/17 71/17
71/22 73/22 75/9
82/11 83/23 88/5
88/15 88/16 88/19
88/23 89/2 89/6
89/11 92/1 92/6
92/25 93/1 93/4
95/19 100/6 100/8
100/16 101/5
109/10 114/9
117/15 124/5 124/7
125/1 125/9 126/11
128/9 130/18
135/13 156/12
158/18 166/10
175/3 176/1 176/2
182/6 186/11
190/17 210/20
211/1 212/4 212/23
213/1 215/22 223/4
227/6 227/8 227/11
229/1 230/5 231/13
232/9 232/12
232/15 232/20
232/20 232/25
233/1 233/2 233/10
233/17 234/3
234/11 234/14
236/14 240/16
241/2 241/6 244/1
done [12] 9/11
56/15 69/13 95/6
102/6 141/13
149/15 159/16
166/22 178/25
231/16 241/1
Dorian [1] 4/1
Dorsey [1] 128/12
dot [4] 155/25
155/25 155/25
184/8
dots [1] 225/23
double [3] 5/2
52/7 52/9
down [81] 15/25
17/8 17/15 18/16
19/8 23/4 23/13
25/17 29/12 30/21
32/7 35/5 38/11
39/18 42/23 43/3
44/8 46/10 49/22
51/11 52/7 52/9
54/19 61/23 65/23
67/12 67/19 68/13
70/22 79/18 79/22
84/20 84/24 85/14
88/7 92/15 102/18
110/18 111/1
114/13 116/1
117/25 120/17
132/16 132/22
137/23 139/21
143/22 144/22
145/15 146/6 146/6
150/13 153/1
161/13 169/4
170/20 174/6 174/9
180/5 180/11 186/6
186/11 187/9 190/6
191/9 192/1 194/7
196/13 197/5
198/21 202/23
204/18 220/10
222/22 223/22
226/4 233/8 233/23

D

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 158 of 254

down... [2] 234/24

235/13

download [1]

123/23

Dr [36] 5/3 30/19

41/18 47/5 60/25

75/16 78/14 80/11

119/9 122/25 125/7

137/25 143/21

147/13 150/17

168/22 169/10

169/15 174/20

177/1 178/13

182/14 185/24

192/7 195/21

199/12 204/4

204/11 205/18

208/17 213/7

218/11 220/12

224/8 232/22 235/1

Dr. [548]**Dr. Craig** [5] 4/5

182/18 182/23

187/18 227/25

Dr. Edman [3]

120/11 121/8

193/25

Dr. Wright [518]**Dr. Wright's** [22]

19/18 42/3 49/7

78/12 88/21 96/25

100/23 106/3

109/12 114/21

125/3 128/3 128/25

129/17 156/2 183/4

224/13 231/4

231/23 241/8

241/21 242/7

draft [6] 32/14

32/16 34/15 167/14

217/21 218/12

dreams [1] 69/2**drill** [1] 169/8**drive** [4] 130/25

131/24 132/8

132/10

driver [1] 70/15**drives** [7] 124/8

127/15 127/19

130/6 132/2 132/4

132/15

drop [1] 36/17**dropped** [1] 9/3**drugs** [1] 9/2**drunk** [1] 101/6**Due** [1] 209/25**dump** [1] 229/16**during** [3] 17/10

41/8 239/22

duty [2] 150/12

150/12

E**e-filing** [1]

151/14

each [8] 6/2 47/12

56/5 56/18 93/20

94/19 154/16

163/24

earlier [6] 75/8

82/18 83/7 178/25

188/22 204/3

earliest [1] 59/15**early** [7] 51/17

94/3 94/15 95/24

160/1 162/6 230/20

easier [1] 115/11**easily** [2] 108/9

214/20

easy [2] 92/10

203/11

ECDSA [1] 172/13**ECF** [2] 151/13

182/19

edit [2] 70/14

88/1

edited [7] 82/4

82/5 82/6 84/2

85/18 85/19 88/3

edits [3] 123/21

123/24 125/4

Edman [3] 120/11

121/8 193/25

effective [1]

157/1

effectively [3]

53/7 93/17 220/22

effort [1] 26/4**efforts** [1] 235/9**eight** [2] 8/24

8/24

either [6] 25/21

82/8 94/19 125/1

216/16 240/14

Elan [2] 161/22

161/25

electricity [1]

155/22

electronic [2]

114/2 242/11

Eleventh [1] 108/5**elicitation** [1]

241/8

elicited [3] 237/7

239/5 241/5

eliciting [1]

241/13

Ellen [1] 216/17**ellipsis** [1]

155/25

else [7] 4/24

10/24 69/9 83/17

89/19 164/7 245/17

email [158] 9/22

10/1 10/2 10/11

11/1 11/10 12/2

12/20 12/21 12/22

12/22 13/25 14/5

14/21 15/4 15/6

15/23 15/25 21/10

E

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 159 of 254
email... [139]
21/15 22/16 22/20
23/2 26/7 27/10
27/13 45/16 48/11
48/17 49/8 49/10
49/12 49/12 50/14
50/16 50/20 51/5
51/6 51/15 54/10
54/14 57/21 58/14
58/16 59/9 59/9
59/12 61/3 61/25
66/11 66/21 66/23
70/9 75/22 76/1
76/4 76/7 76/8
76/11 76/24 77/12
77/13 78/6 81/21
82/13 98/13 98/14
98/15 99/5 99/19
100/23 101/2
101/11 101/20
112/19 113/5
113/10 113/12
113/14 113/16
113/18 116/7
119/14 121/19
122/15 127/7
130/11 130/22
132/20 133/2 133/4
133/15 133/17
146/12 146/15
147/5 147/6 147/7
147/19 147/23
171/24 172/2 174/5
174/6 174/9 184/4
184/5 185/11
187/14 188/22
188/24 189/4 189/5
190/6 190/8 190/9
190/11 191/4
191/13 192/17
192/21 193/7 193/8
204/21 204/23

205/10 205/13
205/20 205/23
205/24 206/6 206/8
206/8 206/10
206/24 207/24
208/25 209/1 209/4
209/20 209/24
210/13 210/24
210/24 211/15
211/17 217/22
218/6 218/12
221/20 222/8 223/7
224/1 233/6 233/7
234/2 234/9 234/14
email's [1] 14/23
emailed [1] 19/7
emailing [2] 16/3
66/6
emails [42] 45/15
45/18 50/2 50/4
50/5 51/17 52/13
53/6 59/18 112/2
112/7 112/17 113/7
121/5 121/10 122/8
122/22 123/1 123/6
125/1 125/8 125/9
126/18 127/4 127/5
127/6 127/9 127/9
128/14 128/15
128/17 129/20
129/24 133/6
133/19 134/1 138/1
140/24 212/14
212/17 212/19
234/12
emotional [1] 5/10
emphasize [2]
52/19 53/4
emphasizing [3]
52/16 53/11 53/15
employed [1]
232/23
enable [1] 9/1
enabled [1] 94/5

encrypt [1] 52/13
encrypted [1]
95/20 112/10 114/8
152/8 242/20
encryption [7]
112/11 112/11
118/7 118/14
173/20 177/2 177/4
end [8] 23/10
55/10 58/3 74/24
103/16 149/17
176/2 208/10
ended [3] 68/20
229/17 235/11
engaged [1] 14/19
enormous [3]
237/20 238/9 239/8
enough [1] 95/25
ensure [4] 64/18
128/21 221/3
238/19
ensuring [1] 92/8
entered [1] 204/13
Entertainment [1]
107/22
entire [6] 90/6
132/10 132/11
142/20 143/15
202/12
entities [2] 43/21
158/14
entitled [8] 36/14
80/4 81/2 84/21
133/19 182/17
185/14 241/10
entity [4] 18/17
159/17 160/5 160/6
Entry [2] 148/16
150/15
EOS [1] 229/16
equaled [1] 90/15
equals [1] 116/19
equipment [1]
135/15

E

USCA11 Case: 22-11150 Document 53-10 Date Filed: 1/30/2022 Page: 160 of 254
Ernst [2] 135/24
136/3
erroneous [1]
214/4
error [1] 114/16
errors [1] 16/8
especially [1]
4/23
ESQ [9] 1/13 1/13
1/16 1/16 1/17
1/19 1/20 1/20
1/21
essential [2]
224/4 224/22
essentially [1]
243/25
establish [5]
166/18 234/24
234/25 239/6
241/16
established [8]
11/12 19/22 23/3
23/4 29/19 164/21
166/12 238/2
establishes [2]
4/22 134/17
establishing [1]
241/17
estate [10] 1/4
66/4 77/18 79/7
96/13 146/1 151/17
220/22 240/4 240/8
et [6] 10/6 94/18
124/4 124/20
159/23 184/8
Ethereum [1]
201/23
evaluate [1] 240/7
evaluation [1]
241/6
even [21] 7/2
26/21 27/19 41/9

56/1 56/3 69/3
83/20 92/25 95/10
100/7 102/3 110/10
121/1 129/23 134/4
170/8 172/8 238/6
242/11 242/20
evening [4] 228/9
235/25 236/7 246/2
event [1] 121/19
events [4] 129/6
129/8 231/8 232/24
eventually [5]
14/5 33/14 34/9
149/3 175/24
ever [9] 20/25
44/17 92/6 96/11
124/7 124/12
171/22 181/10
181/10
every [15] 29/17
95/17 95/17 95/21
95/21 100/12 124/6
124/6 124/6 124/6
150/7 150/7 154/16
165/13 172/5
everybody's [1]
242/16
everyone [12] 4/3
4/15 6/4 8/22
44/23 61/14 61/16
107/11 109/22
158/15 219/12
219/24
everything [19]
27/7 29/22 48/1
70/5 89/11 124/4
136/12 137/8
149/13 154/3
156/18 157/4
166/11 176/18
186/11 190/24
208/8 218/16 236/2
evidence [193]
4/22 7/19 9/17
9/20 11/5 12/17
10/18 13/13 13/19
13/20 14/7 22/5
22/7 22/8 25/4
25/8 25/9 28/19
28/23 31/13 31/18
31/19 33/4 33/9
33/10 35/17 35/21
41/6 41/13 41/14
43/5 43/7 43/8
43/9 44/15 46/6
46/8 46/11 47/23
49/7 50/9 50/10
50/10 50/24 51/1
51/2 51/12 53/22
54/12 58/22 59/5
59/6 61/17 61/18
64/14 64/25 65/1
66/16 66/18 66/19
76/21 77/3 77/5
77/6 81/6 81/10
81/11 86/14 86/16
86/17 96/24 97/1
98/24 99/1 99/2
101/14 101/16
101/17 103/25
104/1 108/14
108/15 110/3
112/24 113/2 113/3
114/23 116/23
119/3 119/22
119/23 120/3
120/20 130/12
130/20 131/5
131/17 131/19
133/10 133/12
133/13 138/19
138/19 146/9
146/19 146/21
146/22 150/21
151/2 151/3 153/14
153/16 153/17
160/19 160/21
160/22 163/9

E

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022
evidence... [76]
 163/10 167/2 167/4
 168/3 168/19
 177/10 178/25
 179/7 179/9 179/11
 182/9 182/11
 182/12 185/5 185/7
 185/8 186/11
 186/21 186/23
 186/24 188/10
 191/10 191/17
 191/24 191/25
 194/10 195/11
 195/12 196/3 196/4
 196/7 196/8 200/11
 205/5 205/7 205/8
 212/6 212/10
 212/11 217/5
 217/25 218/5 218/6
 218/7 221/25 222/4
 222/5 223/4 223/5
 223/14 223/17
 223/18 224/19
 225/8 226/10
 233/13 237/17
 238/5 238/14
 238/19 238/24
 239/4 239/14 240/9
 240/13 240/15
 241/5 241/20
 241/23 242/2 242/6
 242/19 242/21
 242/25 243/1
 244/11
evil [1] 9/6
ex [3] 2/6 113/21
 140/7
ex-staff [1]
 113/21
exact [11] 20/17
 24/3 24/11 55/21
 85/10 90/5 121/1

121/17 148/14

228/11 232/25
exactly [3] 17/19
 18/8 47/20
exaggerate [1]
 79/3
exaggerated [3]
 68/18 78/21 79/12
exaggerating [2]
 79/1 79/9
exaggeration [1]
 79/6
examination [6]
 2/5 6/11 6/13
 230/11 244/7 245/5
examine [3] 5/12
 8/1 105/19
examining [1]
 122/18
example [1] 163/9
except [2] 4/24
 239/16
exception [4] 5/15
 108/15 109/8
 230/12
exceptional [1]
 5/17
exchange [5] 145/9
 200/20 204/21
 217/7 219/11
exchanges [1]
 147/7
excited [1] 97/7
Exclusive [1]
 108/24
Excuse [2] 116/25
 122/13
executed [8]
 195/22 197/2 197/8
 201/10 203/13
 203/14 203/23
 204/5
executive [1]
 21/20

exercise [1]

140/19 142/20 Page: 161 of 254
exhibit [61] 13/20
 22/8 25/9 31/19
 33/10 35/21 41/14
 43/4 43/6 43/9
 51/2 59/6 65/1
 66/19 73/10 73/11
 73/12 73/22 74/1
 77/6 81/11 86/17
 99/2 101/17 104/1
 105/13 113/3
 119/23 131/18
 133/13 146/22
 149/9 151/3 153/17
 160/17 160/18
 160/22 165/12
 167/13 182/12
 185/8 186/24 188/8
 188/8 188/9 191/25
 196/2 196/8 197/6
 198/10 198/22
 205/8 212/11 222/5
 223/18 226/24
 226/25 227/3
 227/18 233/12
 234/16
exhibits [2] 227/9
 227/19
exist [5] 53/25
 90/22 92/12 121/11
 237/23
existed [3] 82/9
 92/24 175/2
existing [1]
 217/10
expand [1] 202/5
expenses [2]
 100/14 214/7
explain [3] 83/2
 181/20 184/20
explained [3] 12/9
 67/25 109/6
explains [3] 36/3

E

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 26 of 254
explains... [2]
40/20 41/20
expletive [1]
93/12
expletives [1]
101/9
extensive [1]
244/7
extent [9] 175/8
228/20 240/9 241/1
242/17 242/18
242/24 244/18
245/6
extra [1] 220/2
extreme [1] 208/7
eyes [1] 51/8

F

F.2d [1] 107/20
F.3d [1] 108/6
F.Supp [1] 108/1
fabricated [1]
14/22
Facebook [4] 128/7
128/8 128/10
128/10
facilitate [1]
231/8
facilities [2]
94/10 94/10
fact [37] 5/13
7/23 27/7 30/19
30/23 34/25 44/20
45/22 46/24 47/6
68/9 71/15 76/7
108/11 121/8 122/6
122/7 122/21
141/20 153/5 164/9
165/10 165/11
176/13 178/6
195/21 201/13
204/1 204/3 222/20
222/24 227/10

237/23 238/3 238/4
239/8 242/10
facts [1] 243/1
factual [1] 109/4
failed [8] 8/9 9/4
68/22 69/7 69/25
70/1 70/2 128/20
failure [1] 9/6
fairness [1]
227/11
fake [4] 23/16
23/18 23/20 190/16
fallacy [1] 132/5
falls [1] 109/7
false [3] 132/7
140/24 141/2
falsified [1]
179/3
family [8] 34/5
44/23 79/9 79/13
156/23 156/24
244/16 244/20
family's [2]
226/15 226/17
famous [1] 26/3
far [4] 70/16
73/14 73/14 121/2
faster [1] 144/23
fate [3] 224/3
224/9 224/21
father [3] 66/6
66/12 69/16
fault [1] 6/5
favor [1] 240/3
February [13] 16/5
16/7 16/15 37/4
37/13 37/19 37/22
66/6 66/23 70/25
71/8 71/16 77/15
February 11th [1]
66/23
February 2014 [2]
37/19 66/6
February 20th [1]

71/8

February 26th [1]

16/15

February 2nd [1]

37/22

February of [1]

71/16

Federal [2] 108/13

108/14

fees [2] 208/3

208/4

fell [3] 8/10 8/10
8/11**Ferrier [3]** 97/8

114/17 115/21

Ferrier's [1]

10/13

few [15] 3/4 27/14

55/21 80/1 93/3

93/4 93/10 111/24

112/20 113/12

123/10 172/12

178/11 235/11

235/24

field [3] 173/13

174/8 243/21

Fifth [4] 107/19

107/21 107/23

108/4

fighting [1]

220/20

figure [1] 65/25**figuring [1]**

147/12

file [16] 6/21

47/14 47/18 71/24

72/6 72/6 73/12

117/5 124/6 136/14

149/10 150/7 152/8

165/6 194/17

239/23

filed [15] 7/3

47/8 47/9 47/15

47/18 66/4 66/4

F

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page: 163 of 254
filed... [8] 96/13
 96/17 97/17 135/9
 135/20 135/20
 151/12 243/7
files [10] 124/20
 128/11 129/6
 140/24 149/18
 152/2 175/1 175/19
 175/24 184/14
filings [5] 136/5
 150/24 151/5
 151/14 243/9
filings [1] 243/6
fill [2] 206/23
 208/24
filled [1] 154/2
final [3] 56/20
 239/2 240/21
finally [1] 40/7
finance [3] 97/11
 115/3 115/18
find [9] 8/1 108/5
 108/18 114/1
 170/12 178/22
 201/18 206/17
 209/20
finding [2] 42/15
 93/7
findings [2] 33/15
 109/5
fine [2] 166/19
 235/22
finish [8] 3/3 8/6
 18/4 18/4 27/13
 141/5 150/6 245/5
finished [1] 82/24
finishes [1] 78/6
Finney [6] 55/20
 56/14 57/9 58/9
 59/15 69/25
fired [1] 32/3
firm [2] 68/23

160/8
firms [10] 125/25
first [57] 10/1
 10/1 20/11 32/9
 32/9 43/15 55/2
 55/4 57/19 58/7
 58/10 59/20 60/3
 61/11 62/1 62/4
 63/10 63/17 64/7
 64/19 68/22 69/12
 75/25 77/17 85/20
 91/21 94/9 104/13
 105/17 108/10
 108/25 114/2 138/5
 139/21 139/23
 140/25 147/2 148/8
 149/14 150/3 153/7
 154/2 159/8 159/21
 169/1 178/9 183/15
 187/10 188/19
 190/7 202/13
 205/10 205/13
 216/15 233/21
 234/25 237/22
five [6] 134/8
 171/15 181/14
 222/10 230/5
 230/16
flaws [1] 8/2
FLEXNER [1] 1/15
FLORIDA [9] 1/1
 1/14 1/18 1/22
 1/24 247/3 247/7
 247/15 247/18
flsd.uscourts.gov [2] 1/25 247/19
focus [5] 42/8
 90/4 172/1 206/12
 215/16
folks [1] 112/20
follow [2] 69/2
 203/11
following [10]
 63/5 63/6 84/15

84/16 144/6 157/23
 157/24 182/25
 199/25 240/24
follows [2] 17/10
 18/10
footnote [1] 36/24
footnotes [3]
 32/23 32/25 34/22
force [1] 226/20
foregoing [2]
 183/10 247/10
foreign [3] 157/7
 158/14 159/16
forensic [4]
 140/19 140/21
 178/23 178/24
forge [4] 120/14
 120/15 193/21
 218/12
forged [7] 141/7
 190/14 193/2 193/7
 207/19 219/1 226/7
forgeries [1]
 121/11
forgery [5] 120/12
 172/7 192/8 193/7
 217/21
forgetting [1]
 140/18
forgive [1] 171/14
forgiven [2] 69/12
 69/12
forgot [1] 155/17
forgotten [3]
 170/15 170/17
 170/18
form [8] 76/20
 102/23 202/15
 202/19 206/24
 208/25 209/3 240/2
formal [1] 197/2
formally [2] 55/8
 56/10
format [1] 154/15

F		
formation [1]	87/23 103/22 103/22 103/23 116/24 116/25 117/4 121/13 146/2 163/7 164/8 165/21 166/19 167/5 193/4 193/11 231/10 232/7 234/24	full [10] 53/13 102/16 110/21 135/23 149/17 156/17 193/8 201/19 219/3 239/22
formats [2]	172/12 172/16	fully [3] 82/23 101/5 240/23
formed [5]	106/10 110/8 155/13 202/7 203/18	fund [3] 28/13 87/9 87/15
former [2]	199/14 203/4	funded [3] 160/5 178/7 178/15
forming [1]	94/17	funding [3] 30/4 135/13 135/14
forms [1]	240/2	funds [1] 219/13
formulated [1]	202/10	funny [2] 121/3 176/18
forth [5]	107/17 125/11 140/4 176/21 179/1	further [9] 5/23 29/23 30/16 53/22
forum [3]	55/11 90/22 92/4	109/15 234/24 238/20 245/22 247/12
forums [2]	92/23 92/23	Furthermore [1] 26/3
forums.bitcoin.org [1]	92/23	<hr/>
forward [12]	14/4 25/23 26/1 36/9 75/11 110/21 165/2 170/25 209/5 230/13 230/15 244/7	G
forwarded [12]	14/11 14/15 14/20 15/13 25/23 50/3 50/16 50/21 51/7 98/13 98/15 149/10	Gables [1] 1/22
forwarding [2]	12/21 12/22	gambling [1] 219/14
found [13]	20/15 40/8 50/2 79/18 80/7 82/2 90/14 90/17 137/10 141/9 144/23 180/2 240/3	gaming [4] 159/20 159/24 160/3 219/13
foundation [22]	13/6 33/6 41/10	gander [1] 243/21
		Gates [2] 174/9 174/10
		gathered [2] 175/14 175/17
		gave [19] 5/3 55/20 55/23 55/25 56/1 56/4 56/4 63/5 70/25 71/15 84/15 88/16 88/19 89/3 89/19 92/17 135/15 149/14

G

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 161 of 254
gave... [1] 157/24
general [2] 65/10
134/8
generally [4] 80/4
80/21 81/15 100/7
Genesis [3] 56/21
57/18 57/25
gentleman [1]
65/16
Gentlemen [6]
107/4 109/22 162/8
168/16 188/17
235/23
get [41] 3/13 4/22
10/14 13/5 25/22
38/21 42/7 51/6
53/20 55/21 57/3
62/21 92/16 94/6
100/12 100/13
109/23 112/12
121/22 124/25
128/8 128/9 129/12
129/21 141/8 148/4
148/4 150/10
162/14 163/4 164/3
168/2 169/4 171/16
182/5 191/9 204/1
221/3 225/22
231/21 232/12
gets [1] 162/17
getting [2] 24/9
129/13
give [9] 7/15 27/4
33/23 88/18 92/20
93/15 150/11
175/19 229/5
given [12] 7/12
9/14 71/6 108/10
108/22 126/11
150/5 150/7 150/7
150/8 190/18 241/3
gives [1] 212/20

giving [2] 90/15
90/16
glasses [1] 171/19
global [1] 136/6
GMX [5] 78/17
88/12 88/18 88/19
89/20
go [91] 3/12 11/24
13/7 17/24 19/17
22/14 29/10 29/10
32/9 32/21 36/8
36/9 36/10 37/8
37/8 46/5 46/20
47/22 54/8 59/18
59/19 60/11 63/17
70/7 76/17 77/23
83/1 84/20 86/7
86/25 90/5 91/16
92/10 100/8 100/9
100/9 100/9 100/10
101/22 103/9
104/11 104/14
107/5 113/25
114/21 114/22
115/13 117/2
118/11 127/9 131/1
131/22 136/13
136/19 136/22
137/5 137/11
139/20 152/20
154/9 160/10
162/10 163/1
168/12 170/11
176/15 180/5
186/10 187/10
188/19 190/7
196/10 196/22
197/15 198/11
199/24 202/4
202/23 203/10
204/25 205/10
209/22 210/22
211/2 211/12 212/3
213/5 213/13 225/7

230/15 236/21
goal [1] 161/6
goals [2] 29/23
30/17
God [1] 56/1
goes [3] 103/24
164/3 191/23
going [73] 4/16
6/24 7/8 10/17
28/2 28/18 44/12
51/6 53/5 53/20
56/8 57/10 62/8
69/5 72/22 75/11
82/6 84/3 86/8
89/22 90/25 100/8
100/11 102/9
104/23 107/1
120/11 120/13
122/1 124/25
125/12 127/22
128/10 138/15
141/15 141/19
141/19 142/1 151/9
156/17 157/3 157/9
158/15 160/4
161/22 162/6 169/4
175/21 179/17
191/7 191/8 192/7
199/24 200/5 204/1
204/2 209/17
210/12 211/16
212/21 228/7
228/11 229/4 230/6
235/24 237/19
237/21 238/6
238/10 239/11
239/15 239/16
245/19
gone [2] 48/17
128/12
Gonzalez [3] 4/13
167/14 168/10
good [20] 3/2 3/5
3/18 3/20 4/3 4/4

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 166 of 254
good... [14] 4/6
 4/10 4/15 6/2 6/4
 6/15 6/16 50/18
 60/9 67/20 107/3
 162/7 162/9 235/19
Google [1] 160/9
goose [1] 243/21
goose/gander [1] 243/21
got [26] 28/17
 37/17 37/25 59/9
 79/18 103/17
 105/18 118/3
 121/20 121/21
 122/2 126/5 127/19
 141/17 159/22
 163/24 167/18
 170/13 170/15
 181/11 190/23
 191/9 212/25
 215/21 229/15
 231/13
government [16]
 45/5 47/8 135/8
 144/5 145/11 157/3
 159/22 159/22
 190/25 193/14
 203/14 219/14
 219/17 220/17
 220/24 222/24
governments [1] 137/18
grabbed [1] 5/9
Granger [1] 216/17
grant [1] 135/10
gratuitous [2] 208/13 233/18
great [3] 95/13
 131/24 161/7
Greg [3] 140/9
 140/9 140/10
Greyfog [1] 135/18

grounds [4] 25/8
 73/18 120/1 239/7
group [8] 63/24
 64/1 102/23 106/10
 110/8 158/3 200/24
 229/13
guarantees [1] 108/23
guess [3] 29/16
 136/6 170/15
Guinea [1] 32/4
Gutmann [1] 132/6
guts [1] 70/1
H
had [131] 8/14
 8/14 9/7 10/11
 10/22 11/1 11/14
 12/3 14/22 14/22
 15/12 15/13 17/22
 17/23 18/3 18/5
 18/6 18/9 28/13
 34/15 34/17 34/17
 34/18 34/25 40/8
 40/9 40/10 48/21
 49/18 50/5 56/22
 61/4 68/18 70/12
 73/23 74/21 75/17
 76/15 78/15 78/17
 78/17 78/20 78/25
 79/2 79/17 79/18
 80/4 80/6 84/2
 84/19 87/6 87/12
 88/14 90/18 90/20
 92/15 92/17 92/21
 93/20 94/15 95/5
 107/11 109/2 109/9
 109/22 114/14
 117/13 118/22
 119/9 121/19
 121/22 121/24
 123/12 127/9
 127/15 127/19
 129/10 135/14

135/20 135/23
 135/25 136/13
 138/14 138/14
 138/15 139/5
 139/11 140/2
 140/11 140/16
 140/17 140/18
 140/21 142/9
 142/18 143/24
 145/12 147/7 148/4
 154/17 155/15
 156/7 156/10
 156/11 156/16
 156/23 165/11
 167/15 175/7
 175/17 175/20
 178/8 179/4 181/5
 181/7 181/9 190/20
 203/21 204/13
 204/15 216/10
 216/16 216/20
 216/22 217/10
 220/20 220/20
 221/3 239/22
 242/13 247/8
hadn't [5] 9/6
 45/20 56/24 56/25
 82/25
Hal [11] 55/20
 56/13 57/9 58/9
 59/13 59/14 59/15
 59/20 60/3 60/7
 69/25
half [8] 12/3
 68/17 69/19 94/4
 145/18 199/1
 205/16 212/17
Halfway [1] 196/13
Halloween [1] 55/15
hand [21] 4/19
 81/18 83/21 86/19
 86/24 87/7 87/11
 87/13 144/25 145/4

H

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022

hand... [11]

150/11 153/22
153/23 169/1 170/2
185/22 186/7 191/5
215/4 217/20
247/14

handed [4] 27/7

107/16 107/16
178/11

handwriting [9]

103/1 103/14
103/22 105/15
105/22 106/14
110/6 110/10
110/11

handwritten [2]

83/21 106/8

happen [4] 39/12

95/9 239/16 241/14

happened [5] 8/8

141/20 141/22
164/19 204/23

happens [3] 15/15

15/17 208/11

happy [7] 5/21

107/1 164/24
230/14 244/12
244/12 245/13

hard [13] 68/21

93/7 128/8 130/6
130/25 131/24
132/2 132/4 132/8
132/10 132/11
132/15 158/22

hardly [2] 74/22

74/23

Hardy [1] 223/8**has [68] 8/19**

10/12 10/20 16/5
21/19 33/5 42/11
42/15 42/21 57/10
63/15 69/12 69/12

75/9 75/16 81/24

95/12 95/20 103/21

108/8 109/3 111/11

118/5 118/10

118/15 118/19

119/4 120/19

122/14 124/10

124/11 125/11

127/11 127/12

127/13 147/11

147/20 151/12

152/7 152/8 164/13

168/4 172/21

173/25 176/21

177/4 177/11

178/10 179/14

179/23 180/3

189/25 191/21

191/22 200/8

208/24 212/8 217/2

237/8 238/18 240/2

241/11 242/6

242/15 243/8 243/8

243/10 245/6

hash [1] 172/14**hasn't [2] 227/5**

227/17

hate [2] 70/1

101/5

have [200] 4/12

4/19 6/6 6/23 9/11

12/9 16/4 17/3

23/24 26/17 27/14

29/25 31/15 31/21

32/16 34/11 34/12

34/15 38/10 45/21

45/22 47/6 49/19

52/14 57/5 57/22

57/24 58/3 61/12

69/13 69/13 69/25

70/1 70/2 73/15

73/22 73/23 74/3

82/24 84/2 84/2

86/19 88/15 88/20

89/5 90/3 91/20

94/7 94/13 94/18

94/19 94/21 94/23

95/4 95/24 98/19

98/21 98/22 99/21

100/7 100/15

100/15 100/16

100/16 100/17

100/17 101/20

102/21 105/23

107/5 107/8 109/9

111/4 112/2 112/10

113/6 113/7 114/4

115/9 116/9 117/17

118/13 121/16

123/7 123/11

123/12 124/5 124/6

124/8 125/7 125/9

125/20 126/4 127/7

127/8 128/11

129/20 129/23

130/18 131/6 131/8

131/11 134/4 140/7

140/24 141/12

141/13 141/18

147/20 150/9

150/10 150/10

153/19 154/14

157/1 157/12

158/19 158/19

158/22 159/18

161/24 162/16

163/1 163/22

163/23 164/15

164/16 167/9

167/15 167/18

169/7 169/13

170/13 170/15

170/16 170/18

171/13 172/7

172/17 174/9 175/7

176/3 178/13

178/15 179/2

180/15 181/16

H

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page: 18 of 254

have... [53]

187/24 188/6
 189/11 189/16
 190/24 190/25
 191/8 195/24 202/9
 206/10 209/15
 210/2 215/15
 219/21 220/5
 220/21 220/23
 224/4 225/21
 227/15 227/22
 228/2 228/3 228/5
 229/6 229/8 229/8
 229/20 229/20
 230/8 230/11
 230/16 236/7
 236/16 236/21
 237/20 238/5
 238/16 239/9 239/9
 239/10 239/25
 240/22 241/2 241/3
 241/19 243/6 243/7
 243/17 244/19
 245/1 246/2 247/14

haven't [12] 57/6

85/10 95/23 121/5
 145/23 145/24
 165/21 166/19
 180/20 217/16
 228/19 241/9

having [5] 21/8

136/7 172/15
 181/14 239/18

he [143] 5/10

11/17 11/21 12/6
 12/7 16/3 17/20
 17/21 17/22 17/22
 18/3 18/5 18/9
 18/9 18/12 18/13
 18/16 23/23 23/24
 23/24 23/25 24/1
 24/2 24/6 26/1

39/13 39/14 44/21

48/21 49/18 50/5
 51/24 52/7 52/10
 58/11 59/20 59/20
 60/2 60/3 60/3
 65/15 68/16 68/19
 68/25 69/2 69/8
 69/15 69/16 69/16
 69/20 70/17 74/17
 74/17 75/19 77/22
 78/3 78/5 78/6
 78/6 78/17 78/20
 79/2 79/15 83/18
 87/6 87/12 88/15
 88/15 92/18 111/8
 111/10 111/12
 111/14 111/17
 111/22 117/13
 121/16 122/19
 122/23 123/23
 124/11 124/13
 124/14 124/15
 129/11 129/11
 129/13 129/13
 129/14 129/14
 129/15 129/21
 129/22 138/8 145/8
 147/5 147/7 147/11
 156/23 161/22
 161/23 164/2 164/5
 164/8 164/14
 164/19 167/21
 167/22 167/25
 168/2 170/9 170/13
 170/15 170/15
 170/16 170/16
 170/17 170/18
 170/19 170/19
 172/2 177/12 191/2
 191/21 192/22
 208/3 208/23
 212/20 212/20
 218/13 222/25
 225/15 226/1

230/24 231/14

232/2/2 232/11
 232/12 232/16
 232/19 241/22
 242/8 244/24
he'd [1] 124/7
he's [16] 16/2
 70/2 79/11 120/13
 122/1 155/14 164/2
 165/24 166/6 182/7
 182/7 190/1 190/1
 211/16 232/12
 237/2
head [4] 23/23
 71/3 73/7 216/18
headed [1] 35/4
header [3] 32/14
 34/11 34/12
heading [1] 35/8
hear [8] 48/15
 51/22 74/22 74/23
 75/25 79/19 96/14
 202/17
heard [10] 7/15
 27/24 28/1 39/14
 44/19 74/3 77/20
 168/8 170/6 239/1
hearing [7] 5/8
 157/10 157/13
 157/20 157/23
 165/25 209/5
hearings [3] 3/3
 6/6 6/7
hearsay [16] 5/2
 5/5 5/16 25/6
 71/25 73/16 73/18
 75/7 108/9 108/12
 108/15 109/8
 116/25 116/25
 150/24 150/25
heart [3] 70/5
 87/6 87/13
Hector [2] 155/14
 155/14

H	174/16 179/18 181/20 197/18 201/25 211/4 212/14 217/9 219/20 239/16 243/23 243/25 244/15 244/17 hereby [1] 247/7 hereunto [1] 247/14 hernandez [6] 1/23 1/25 247/5 247/17 247/17 247/19 Hi [2] 77/20 78/14 hidden [2] 45/13 45/14 hide [6] 45/21 46/24 47/6 53/25 135/6 136/24 hiding [2] 201/17 202/3 higher [1] 207/24 highlight [42] 5/7 42/1 43/15 43/16 47/2 48/12 48/23 48/24 86/21 87/5 87/9 87/12 87/15 101/9 136/23 139/7 139/21 139/23 143/15 144/17 161/3 171/4 187/20 192/4 192/20 195/3 196/14 197/20 198/11 198/25 202/4 211/4 214/11 214/19 215/3 218/8 222/12 222/15 223/25 224/20 225/16 233/21 highlighted [5] 26/11 49/2 171/1 202/24 202/24 him [43] 10/18 27/11 27/24 27/24	28/1 42/12 49/18 50/4 50/5 51/8 51/16 53/6 53/8 68/3 68/8 68/19 69/14 69/14 69/17 70/12 78/21 78/22 87/6 87/12 88/16 88/17 88/18 88/19 88/23 94/3 99/8 100/2 108/25 113/12 129/21 138/6 171/25 179/24 206/9 212/21 232/16 232/20 232/21 himself [4] 152/22 170/19 223/10 237/2 hired [5] 94/3 155/14 158/22 231/7 231/15 hiring [1] 155/22 his [39] 20/15 44/21 50/21 53/17 57/11 69/16 70/1 70/14 71/20 79/1 80/8 82/3 88/21 103/22 117/10 123/13 124/8 124/10 124/11 147/11 152/9 155/17 158/3 165/18 165/23 171/24 172/1 172/4 173/12 174/24 205/18 205/20 206/8 206/8 206/10 242/22 244/16 244/20 245/2 history [2] 147/3 202/14 hit [1] 166/23 hobby [1] 47/20 hold [13] 29/17
----------	--	--

H

hold... [12] 75/9
95/20 97/19 102/22
129/7 130/3 130/14
130/16 137/5 217/2
241/22 242/8
holder [1] 197/23
holding [2] 43/20
181/21
holdings [1] 152/9
hole [1] 75/3
home [3] 69/4 80/8
82/3
honest [2] 21/24
101/4
Honey [1] 69/4
Honor [228] 3/5
3/9 3/11 3/18 3/20
3/25 4/4 4/6 4/8
4/10 4/12 4/20 5/1
5/7 5/11 5/16 5/24
13/12 13/14 13/16
20/1 22/4 25/3
25/5 28/20 31/12
31/14 33/3 33/5
35/16 35/18 39/25
41/5 41/7 41/11
43/5 48/13 48/16
50/23 50/25 52/20
53/16 58/21 58/24
59/4 60/9 60/15
60/19 60/20 62/19
62/22 64/13 65/2
66/15 71/23 73/8
73/14 73/16 73/21
73/25 75/6 75/8
77/2 81/5 86/13
86/15 89/12 90/3
91/11 96/3 96/5
98/23 101/13
103/20 103/21
103/23 104/16
105/1 105/8 106/2

106/25 109/14
109/17 109/18
112/23 114/25
116/22 116/24
117/1 117/3 117/5
117/17 117/18
119/2 119/4 119/21
119/25 120/23
121/13 122/10
125/17 126/8
126/12 126/25
131/4 131/10 133/9
134/17 141/23
146/18 149/22
150/20 150/22
150/24 152/23
153/13 153/15
154/22 155/4
160/18 162/4
162/14 162/20
162/21 163/4 163/8
163/18 163/22
164/12 164/24
166/2 166/3 166/14
166/21 167/7 167/9
167/16 173/3
174/11 174/22
175/9 176/3 177/11
178/20 182/8
184/10 184/24
185/4 185/6 186/20
186/22 188/9
191/16 191/19
192/11 193/3
193/10 194/3 194/9
196/3 196/5 203/6
204/6 205/4 205/6
207/20 208/12
212/5 212/7 217/23
219/6 222/1 222/3
223/15 223/16
226/9 226/23
227/14 227/19
228/1 228/5 228/10
228/14 228/15
229/10 229/25
230/2 230/4 230/9
230/13 231/11
232/6 234/19
234/23 235/22
236/12 236/17
236/19 236/23
237/6 237/15 238/3
238/11 238/13
239/1 239/12
240/21 240/23
241/7 241/16
241/24 242/9
242/21 242/24
243/16 243/20
243/23 244/14
244/15 244/21
245/4 245/8 245/16
245/21 245/24
246/1
HONORABLE [1] 1/10
horde [1] 138/6
horrendously [1]
128/8
Hotwire [2] 45/20
121/24
hotwirepe.com [2]
45/19 67/1
hour [1] 107/5
housekeeping [2]
167/9 167/12
how [26] 8/18 21/6
39/4 52/19 53/2
69/9 69/16 82/9
93/5 111/14 132/2
132/4 132/14
136/15 136/16
142/17 145/5 157/3
158/10 160/1 162/8
164/7 201/24
208/18 233/1
235/18

H	93/7 100/8 100/8 100/14 100/14 102/9 104/23 105/25 106/16 106/25 107/1 110/22 110/24 125/12 125/15 126/4 127/18 127/22 131/8 138/15 138/15 138/15 150/5 155/17 156/6 156/8 156/13 156/17 157/2 157/2 157/9 157/11 158/17 161/22 161/23 161/23 162/1 162/2 162/4 163/11 164/7 164/24 165/17 165/18 165/25 166/4 167/2 167/2 167/25 172/8 179/18 185/25 188/12 191/7 191/8 192/7 202/15 202/19 202/20 209/2 210/12 212/21 219/15 228/19 230/14 232/14 234/18 234/21 234/23 244/12 245/19 I've [20] 46/24 71/6 123/11 141/17 149/15 149/18 150/7 150/7 150/7 150/8 155/11 181/11 202/12 208/25 212/25 217/12 217/17 226/15 236/17 243/8 IBC [6] 195/6 195/8 195/15	195/16 203/19 207/12 ICU [2] 63/21 161/1 idea [3] 8/8 8/16 29/22 ideas [6] 9/11 80/13 82/15 83/9 86/23 87/20 ideas' [1] 85/2 identical [2] 87/2 192/18 identifiable [1] 237/10 identified [2] 108/9 212/8 identify [4] 150/1 191/21 206/23 218/2 ignore [3] 100/12 100/13 204/3 II [6] 181/4 181/24 184/9 184/17 184/23 204/4 illegal [1] 159/21 image [3] 63/17 64/7 64/19 imagine [4] 94/22 94/24 136/8 136/10 immutable [1] 95/16 impeach [3] 73/8 127/4 226/23 impeachment [18] 62/20 73/12 73/13 73/20 73/25 74/6 74/7 75/7 75/12 126/9 126/11 226/24 227/2 227/4 227/5 227/9 227/18 228/2 impeachment-only [1] 226/24
hub [1] 124/23 huge [1] 136/10 huh [7] 15/3 16/25 17/2 23/6 28/6 151/11 200/2 human [1] 202/14 hundred [3] 45/6 47/7 156/22 husband [1] 69/10		
I		
I'd [19] 8/8 9/1 28/2 28/3 44/13 52/9 96/16 110/21 115/2 123/15 132/14 137/25 168/6 174/21 206/12 228/13 228/15 238/3 240/24 I'll [15] 18/4 40/3 72/3 74/6 110/20 121/15 127/2 136/16 155/25 184/12 184/25 193/12 212/9 236/7 244/8 I'm [117] 5/21 10/24 19/25 25/22 26/18 28/2 28/18 28/21 31/24 33/18 43/5 44/12 47/15 53/5 54/23 56/5 56/8 57/24 57/25 59/10 61/13 61/15 62/22 68/20 69/4 69/5 69/5 69/11 71/6 71/9 71/18 72/9 73/22 76/21 77/20 82/6 82/12 83/2 83/5 84/3 89/22 90/25 92/14 93/6 93/6 93/7		

I	individual [8] 71/7 155/23 174/2 176/10 239/9 241/18 242/14 244/16 individuals [2] 56/18 57/12 industry [2] 160/2 160/3 Info [7] 1/4 18/16 19/22 23/4 151/19 240/4 240/8 information [13] 45/3 95/25 127/16 135/6 136/24 137/18 152/7 155/12 159/15 161/19 165/12 244/4 244/4 initial [2] 100/23 106/21 initialing [1] 106/19 initials [8] 106/13 106/16 106/17 106/18 106/21 106/22 106/23 106/24 initiate [1] 77/17 Innovention [1] 107/22 inquire [1] 243/18 Insecure [3] 80/4 80/21 81/15 inside [2] 32/16 202/12 insignia [1] 169/16 insignificant [1] 177/25 instance [1] 181/15 instigated [1] 14/22	instructed [1] 8/10 10 Page: 172 of 254 instructing [1] 240/19 instruction [1] 80/23 Integyrs [1] 36/4 intellectual [10] 14/6 15/7 15/16 15/20 47/16 237/11 237/25 238/1 238/16 241/10 interacted [1] 12/11 interest [1] 27/14 interim [3] 13/6 15/1 51/7 internal [2] 15/11 135/25 international [20] 156/21 157/6 157/25 159/14 161/20 195/1 195/8 195/15 197/12 198/14 200/16 200/23 200/23 201/16 203/18 204/16 210/1 212/23 218/16 218/17 Internet [7] 8/15 55/13 92/2 155/21 159/21 160/1 170/22 interplays [1] 5/5 interview [10] 5/7 37/25 38/3 70/25 71/15 108/25 142/8 144/14 144/22 227/25 interviews [2] 71/6 235/17 introduce [4] 71/24 126/13 237/1
implied [1] 112/9 important [6] 68/19 69/15 69/16 79/4 162/18 228/18 importantly [1] 108/20 impressed [1] 77/22 improper [8] 33/7 62/19 73/13 73/20 75/7 126/8 194/3 239/11 inappropriate [2] 194/11 208/14 inauthentic [1] 191/20 include [2] 199/6 203/3 included [2] 27/5 90/6 includes [2] 118/22 199/13 including [6] 95/20 112/20 124/22 165/7 175/19 234/9 inclusive [1] 228/22 inconsistent [2] 73/9 166/10 incorporation [1] 102/25 incorrect [8] 40/12 53/10 89/21 126/1 131/14 174/4 220/3 226/22 increase [2] 161/6 210/2 incredible [1] 78/8 index [1] 55/13 indicated [1] 6/23	71/7 155/23 174/2 176/10 239/9 241/18 242/14 244/16 individuals [2] 56/18 57/12 industry [2] 160/2 160/3 Info [7] 1/4 18/16 19/22 23/4 151/19 240/4 240/8 information [13] 45/3 95/25 127/16 135/6 136/24 137/18 152/7 155/12 159/15 161/19 165/12 244/4 244/4 initial [2] 100/23 106/21 initialing [1] 106/19 initials [8] 106/13 106/16 106/17 106/18 106/21 106/22 106/23 106/24 initiate [1] 77/17 Innovention [1] 107/22 inquire [1] 243/18 Insecure [3] 80/4 80/21 81/15 inside [2] 32/16 202/12 insignia [1] 169/16 insignificant [1] 177/25 instance [1] 181/15 instigated [1] 14/22	
		71/7 155/23 174/2 176/10 239/9 241/18 242/14 244/16 individuals [2] 56/18 57/12 industry [2] 160/2 160/3 Info [7] 1/4 18/16 19/22 23/4 151/19 240/4 240/8 information [13] 45/3 95/25 127/16 135/6 136/24 137/18 152/7 155/12 159/15 161/19 165/12 244/4 244/4 initial [2] 100/23 106/21 initialing [1] 106/19 initials [8] 106/13 106/16 106/17 106/18 106/21 106/22 106/23 106/24 initiate [1] 77/17 Innovention [1] 107/22 inquire [1] 243/18 Insecure [3] 80/4 80/21 81/15 inside [2] 32/16 202/12 insignia [1] 169/16 insignificant [1] 177/25 instance [1] 181/15 instigated [1] 14/22

I	4/1 19/7 22/20 50/1 50/3 50/17 50/21 51/15 51/20 52/1 54/14 54/17 57/21 61/4 61/4 70/9 70/12 76/17 76/25 77/12 77/20 78/14 78/24 79/8 122/14 123/7 131/12 146/7 147/5 151/16	204/11 205/22 205/9 217/13 218/13 219/4 220/12 226/1 226/8 226/21 230/10 232/25 234/2
introduce... [1]		issue [22] 15/16 36/13 36/13 53/21 54/25 56/7 163/6 176/10 178/4 228/4 230/12 236/19 236/23 237/1 238/25 239/24 239/25 240/18 242/1 243/10 244/3 244/19
244/23		
introduced [3]	31/16 165/25 168/5	
introduction [5]	17/8 25/20 26/2 117/11 117/16	
invent [1] 69/7	122/14 123/7	
invented [2] 94/2	131/12 146/7 147/5	
94/15	151/16	
invention [7] 8/1		issued [5] 33/23
8/9 8/13 67/13	Ira's [1] 147/19	40/7 203/14 215/20
68/4 69/11 95/14	IRC [7] 123/24	220/20
invest [1] 156/13	124/1 124/2 124/7	issues [6] 11/11
investigation [1]	124/16 124/23	106/9 110/8 123/16
140/23	127/13	236/16 236/22
Investment [1]		it [649]
157/7	irregularities [1]	it's [197] 5/7
Investments [12]	105/24	5/17 6/4 8/5 11/3
156/21 158/1	IRS [3] 32/17	14/25 18/8 21/2
159/14 161/20	32/18 95/23	22/17 27/8 27/14
195/2 195/15	is [513]	28/8 28/23 29/6
197/12 198/15	isn't [71] 15/9	35/20 40/1 41/10
200/16 201/16	18/7 30/24 40/11	43/5 43/5 43/6
203/18 204/16	45/1 45/24 53/21	46/1 46/8 47/17
investors [1]	54/3 57/25 58/7	49/12 49/12 50/10
156/9	62/4 63/13 68/9	50/10 50/20 52/2
invoice [11]	68/15 69/21 70/3	55/12 56/5 57/8
209/20 210/6 211/4	72/19 75/18 79/5	58/1 58/1 58/3
211/5 211/17	79/14 80/8 90/18	61/17 61/18 64/20
214/18 215/2 215/3	93/23 94/1 111/20	67/1 68/15 68/21
215/6 215/20 216/1	116/9 119/9 122/25	71/17 72/1 73/11
involved [5] 32/3	123/5 123/9 123/21	73/11 73/12 73/13
38/9 40/19 78/16	123/24 125/7	73/17 73/25 75/7
233/1	126/21 128/19	75/7 76/11 82/4
involves [3] 127/4	128/22 129/9	83/14 83/22 83/22
201/20 236/24	129/22 134/14	86/4 88/1 91/25
involving [1]	135/5 137/8 140/17	95/22 96/25 97/1
175/2	141/22 143/25	
IP [1] 95/21	144/2 148/1 149/4	
IPO [2] 8/14 160/1	155/8 156/19 158/7	
IRA [32] 1/3 3/14	172/10 172/21	
	190/14 190/16	
	200/22 203/5	
	203/21 204/4	

I

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 10/30/2022 Page: 174 of 254
It's... [135]
 99/14 100/6 103/17
 103/22 106/2
 106/14 106/15
 107/16 114/23
 115/11 116/8 117/5
 118/2 118/3 118/6
 121/2 124/19
 125/25 126/15
 126/21 127/17
 131/11 132/4
 133/19 135/14
 136/9 136/17 141/4
 141/4 141/16
 145/21 147/2
 147/14 147/14
 147/14 150/24
 150/25 150/25
 151/16 153/12
 154/24 154/24
 155/2 157/13
 158/13 158/14
 158/15 158/16
 158/16 158/17
 158/23 159/5
 159/12 160/10
 160/12 162/18
 162/23 164/6 166/3
 168/24 169/21
 170/20 170/22
 173/12 173/13
 173/15 174/5
 176/25 178/3
 178/12 179/9
 182/23 183/6
 183/22 186/5
 186/10 188/3
 188/24 190/1
 191/15 191/23
 194/11 195/11
 195/12 195/24
 196/3 200/5 200/21

201/13 203/7

203/11 204/3 206/18
 206/8 206/10
 207/10 210/18
 211/9 211/10
 211/20 211/21
 213/15 215/13
 218/5 222/11 223/7
 223/11 226/25
 227/2 227/2 227/4
 227/14 227/16
 227/18 227/24
 228/1 228/4 228/17
 228/22 228/25
 228/25 233/10
 234/16 237/18
 238/11 238/11
 238/12 239/11
 239/11 240/18
 241/14 241/17
 242/19 243/20
 243/21
item [1] 165/16
items [1] 16/23
its [4] 37/2
 191/23 199/5
 240/16
itself [7] 18/23
 97/20 108/24 135/7
 184/11 190/8 203/7

J

Jack [1] 128/12
Jamie [2] 34/17
 223/11
January [10] 56/22
 56/24 57/19 151/24
 152/3 155/13
 159/10 189/21
 190/2 227/24
Jennifer [1] 16/20
John [13] 12/10
 12/22 16/3 16/3
 16/18 17/16 17/19

37/3 37/18 100/15
 155/15 155/18
 216/15
join [1] 236/10
joint [33] 2/10
 2/19 2/21 7/9 7/10
 43/4 43/6 43/9
 94/16 94/20 95/9
 95/10 95/11 95/22
 96/1 96/10 98/6
 110/14 120/21
 120/21 160/16
 160/18 160/22
 196/2 196/8 197/6
 198/10 198/22
 199/5 199/24 203/3
 234/15 238/15
jointly [3] 93/23
 94/1 95/8
Jonathan [4] 116/4
 116/5 163/13 170/6
JORGE [2] 1/20 4/8
journalists [2]
 235/10 235/11
judge [13] 1/10
 108/25 109/2 131/6
 131/14 152/9
 167/15 167/19
 167/20 167/25
 168/9 168/10 243/8
judges [1] 47/11
July [5] 36/4
 40/20 41/20 95/9
 207/10
juncture [8] 237/7
 237/16 237/24
 238/5 239/5 241/4
 242/23 242/25
June [19] 36/4
 40/21 41/21 47/8
 47/19 90/23 135/10
 157/10 157/13
 157/21 183/17
 183/22 183/25

J

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022
June . . . [6] 185/12
 188/24 190/11
 192/4 199/25 200/1
jurisdiction [2]
 144/19 145/2
jury [77] 1/11
 4/16 5/25 6/1 6/20
 7/18 13/22 14/4
 22/16 25/11 26/12
 32/8 35/22 39/8
 40/14 41/15 41/25
 44/20 46/6 46/13
 49/2 54/11 57/5
 60/13 60/18 60/21
 64/16 77/9 81/12
 86/21 87/6 90/4
 91/13 97/2 99/3
 101/18 104/2 107/7
 107/14 109/6
 109/16 109/19
 109/20 114/24
 120/19 136/19
 138/20 141/21
 151/6 151/10
 160/23 162/12
 162/15 162/17
 166/13 168/13
 168/14 182/15
 185/9 186/10 187/1
 188/13 192/15
 195/11 205/9 222/6
 225/10 227/13
 236/9 237/3 237/19
 237/21 237/21
 239/7 239/15
 240/19 242/20
just [121] 4/18
 4/19 4/22 10/15
 13/6 15/15 15/23
 16/15 22/12 22/13
 26/18 28/2 29/7
 29/16 29/17 34/14

36/17 38/15 38/21
 40/14 40/14 41/12
 44/13 44/15 47/25
 50/9 50/9 51/25
 53/4 57/5 57/18
 62/21 63/17 64/7
 64/18 64/19 64/20
 65/5 66/2 66/9
 68/15 68/20 69/4
 71/10 76/4 76/20
 78/6 79/1 80/18
 83/2 83/13 85/24
 92/10 98/9 100/8
 100/23 100/24
 100/25 101/9
 102/16 104/11
 105/16 107/17
 112/16 115/11
 115/11 115/14
 122/14 130/9
 130/15 130/16
 131/10 131/13
 132/17 133/4
 139/14 139/20
 143/14 147/6 149/7
 150/14 155/25
 157/4 161/23
 161/25 162/21
 163/5 164/13
 165/17 166/2 166/5
 166/11 167/12
 173/13 179/8
 180/23 182/2 184/9
 184/17 186/11
 188/19 190/1
 191/11 191/21
 201/7 204/19 207/2
 210/14 210/15
 212/14 213/3 219/2
 222/15 223/3
 228/14 228/19
 230/16 232/15
 233/4 234/18
 243/21

justified [1]

111/15 Page: 175 of 254

K

KASS [2] 1/21 4/10
keep [17] 45/1
 47/25 48/1 48/5
 50/5 51/20 53/6
 53/8 64/24 96/1
 102/12 107/1 122/3
 162/6 200/25 201/1
 209/17
kept [4] 12/6 49/4
 85/10 93/20
key [47] 20/22
 42/20 43/20 65/25
 67/7 67/13 67/24
 68/3 68/8 93/4
 94/16 94/19 111/4
 111/8 114/14
 116/10 116/20
 118/2 118/6 118/6
 118/7 118/14
 119/10 120/9
 120/14 124/6 152/7
 154/3 163/23
 163/24 163/25
 164/6 172/7 172/11
 172/13 172/13
 172/18 172/20
 172/21 173/20
 173/22 177/2 177/2
 177/4 177/5 181/21
 202/8
keys [10] 21/3
 111/21 112/6
 112/10 114/7 117/7
 118/18 169/3
 173/25 202/10
keyword [2] 166/22
 166/23
kicked [1] 128/12
kids [1] 156/13
kill [1] 141/1

K

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022
kind [1] 116/7
Kindly [2] 206/20
209/1
KLEIMAN [192] 1/3
1/4 3/15 4/2 7/23
13/9 18/17 19/7
19/16 19/22 22/2
23/3 23/15 23/18
23/21 24/4 24/23
24/25 26/13 27/11
30/7 30/7 38/23
41/2 42/12 42/25
44/5 44/20 45/1
48/1 48/5 49/15
50/15 50/16 50/20
50/21 51/5 51/6
51/16 52/1 52/1
53/9 53/21 54/4
54/14 57/21 58/7
58/19 61/1 62/1
62/4 63/10 64/11
65/13 65/18 65/21
66/12 67/23 68/16
69/18 70/9 70/20
71/20 72/19 73/2
76/25 76/25 77/12
77/17 78/24 79/7
81/2 86/25 87/18
89/4 93/15 96/9
98/2 98/14 98/16
98/20 99/5 99/20
100/20 101/3
101/21 101/24
101/24 102/22
111/17 111/20
112/3 112/21 114/4
116/20 118/13
118/15 119/15
120/5 121/6 121/10
121/11 122/8
122/18 122/22
123/1 123/8 125/11

127/15 129/4 129/9
129/20 129/23
129/25 130/5
130/11 130/23
131/13 132/3
132/12 134/23
138/1 138/2 140/17
144/3 145/13
146/13 146/15
147/5 151/16
151/17 163/21
163/21 164/1 164/7
165/4 165/7 166/23
169/5 169/9 169/11
169/17 169/19
169/21 169/22
169/22 169/23
169/23 169/23
171/2 171/6 171/21
172/6 174/14
174/16 179/17
179/24 180/8 184/5
184/5 185/11
187/14 187/23
188/5 188/22
188/23 189/6
189/10 189/15
189/25 191/14
192/21 199/25
200/1 200/4 200/4
200/8 201/8 203/11
204/14 218/12
219/3 223/10 224/3
224/22 224/23
225/3 237/11 240/4
240/8 241/10
241/11
Kleiman's [16]
27/25 31/9 42/3
73/15 117/14 119/9
120/15 120/20
123/6 125/1 127/14
127/14 147/3
179/19 217/22

226/6

Kleiman [1] 11 of 254
84/22
Kleimans [2] 50/19
147/2
knew [14] 45/6
47/13 47/13 47/13
47/14 47/20 47/20
89/10 94/14 136/2
136/3 136/4 136/4
136/14
knitting [1] 58/3
know [94] 3/6 7/4
8/7 8/18 8/18 8/22
26/2 26/4 27/2
28/2 33/17 33/19
33/20 33/20 33/22
38/20 44/12 44/25
52/2 52/9 55/12
58/9 62/5 63/11
63/17 64/2 67/12
68/3 69/9 71/14
74/21 76/20 78/7
82/11 89/2 92/1
92/2 93/1 100/6
101/4 108/8 114/14
121/8 126/10 128/9
131/11 134/8
135/13 135/13
138/8 147/3 148/19
156/12 160/2
160/12 160/15
162/5 162/15
164/18 164/19
166/4 175/3 176/1
176/2 181/16 182/6
190/17 206/20
215/22 219/11
219/13 219/17
223/4 225/22
231/13 231/13
231/14 231/15
231/16 231/16
231/18 231/19

K	large [2] 8/13 100/14 100/14 100/14 larger [1] 58/24 Las [2] 5/4 108/1 Lasseters [1] 159/20 last [17] 10/1 27/15 48/20 61/11 77/23 104/6 119/19 155/17 159/2 161/3 161/4 171/14 183/3 193/21 205/10 205/11 211/19 late [5] 3/4 66/6 66/12 171/14 210/2 later [13] 6/7 20/16 53/21 82/4 82/5 87/20 94/4 131/15 142/8 171/13 194/1 206/11 220/23 launch [1] 170/12 launched [2] 94/9 95/3 law [10] 5/21 21/3 107/15 241/20 243/11 243/15 243/24 244/9 244/13 245/6 laws [2] 182/25 183/12 lawsuit [3] 96/13 96/17 160/13 lawsuits [3] 6/18 7/3 111/16 lawyer [4] 14/15 15/6 122/17 220/18 lawyers [26] 6/23 14/11 14/17 14/24 15/10 15/11 15/13 15/14 15/17 15/24 44/19 47/13 79/17 79/19 110/20 118/24 118/25	150/11 152/18 152/15 174/18 175/7 175/20 175/22 176/1 215/15 lay [4] 13/6 163/7 164/8 167/5 layer [1] 108/11 layers [1] 108/8 lead [1] 237/19 leaked [1] 113/6 learned [2] 236/2 236/2 lease [1] 121/21 least [5] 32/4 45/6 52/13 227/22 236/14 leave [4] 115/8 115/9 137/25 244/8 leaving [1] 218/20 led [1] 27/25 ledger [2] 95/15 199/23 left [32] 7/5 12/14 14/15 81/18 86/19 86/21 87/4 87/11 87/13 92/22 115/8 115/10 115/10 123/5 128/22 129/4 143/19 144/25 153/22 153/23 168/25 169/1 182/21 185/22 186/7 191/5 192/5 198/10 213/8 213/16 215/4 217/20 left-hand [13] 81/18 86/19 87/11 87/13 144/25 153/22 153/23 169/1 185/22 186/7 191/5 215/4 217/20
know... [12] 232/9 232/20 232/20 233/1 233/1 233/2 235/13 235/19 237/7 242/1 243/24 243/25 knowing [3] 8/19 8/21 9/11 knowledge [2] 38/10 141/4 known [4] 49/18 171/24 202/6 204/23 knows [8] 47/17 55/12 57/22 61/4 61/12 164/2 219/24 232/8 KPMG [3] 135/22 135/22 136/2 KYLE [2] 1/13 3/22		
L		
label [13] 26/24 27/2 27/8 116/19 118/20 164/13 173/12 173/15 174/2 174/4 174/17 176/10 177/7 labeled [2] 64/20 163/25 Lack [5] 121/14 126/25 204/6 231/10 232/6 Ladies [6] 107/4 109/21 162/8 168/15 188/17 235/23 LAGOS [2] 1/17 3/24 laid [2] 165/21 166/19 language [2] 101/9 124/19		

L

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 128 of 254
legal [7] 14/18
14/22 15/7 15/9
15/18 160/3 175/10
legally [1] 160/5
Leon [1] 1/21
less [3] 132/8
147/2 219/25
let [31] 3/6 6/4
6/9 18/4 18/4
20/25 44/14 55/6
62/21 69/14 71/14
72/12 78/23 79/15
89/2 94/7 102/5
107/17 108/13
108/18 108/24
110/20 117/22
130/16 141/5 147/3
148/19 163/10
193/25 206/20
235/19
let's [67] 3/12
5/25 13/6 16/1
19/18 20/19 25/17
27/10 27/13 28/8
28/16 29/10 29/10
32/7 36/8 36/24
37/8 39/2 54/8
60/11 63/16 66/3
70/7 76/17 79/25
96/12 98/1 100/19
103/1 103/9 104/18
106/7 107/4 109/19
114/21 114/22
115/13 136/18
139/20 139/20
144/5 144/16
147/13 162/10
168/12 173/5
177/16 183/25
185/22 186/7
187/10 187/15
188/19 189/3 189/3

190/7 192/2 194/7
196/1 201/7 208/11
208/15 213/3
215/16 228/8 229/5
232/15
letter [3] 187/17
189/6 189/10
letting [1] 201/20
level [2] 135/23
243/21
Liberties [2] 5/4
107/25
Liberty [1] 219/13
libraries [1]
124/22
license [1] 15/21
licensed [2]
159/21 159/22
life [10] 8/11
68/19 79/9 124/10
124/11 161/6
190/25 217/17
226/16 231/18
light [4] 48/5
238/3 239/8 243/24
like [79] 5/6 8/19
28/2 28/3 29/22
32/14 32/15 40/9
44/13 47/14 51/25
52/24 52/25 53/4
53/7 55/12 58/3
58/5 58/10 63/24
71/23 89/12 94/13
94/17 94/20 94/22
94/23 95/14 96/16
103/19 104/19
106/3 106/14
110/11 110/21
116/6 116/8 123/15
124/14 124/17
128/10 132/5 136/7
136/8 137/25
149/10 156/13
159/24 161/23
161/25 166/5 166/8
174/5 174/12
176/14 181/17
182/3 188/3 193/8
196/4 201/24
204/13 206/12
206/20 216/13
218/13 219/2
219/14 219/17
225/4 228/1 228/13
228/15 229/2
231/15 231/20
232/15 238/3
240/24
liked [1] 182/6
limit [2] 210/2
213/1
Limited [10] 41/8
159/15 200/23
201/4 205/2 207/6
211/8 213/21 214/1
215/23
limits [1] 209/25
line [41] 29/10
43/15 48/17 48/20
62/21 74/22 74/24
87/8 87/14 88/3
91/14 108/19
125/13 125/14
125/23 139/2 139/7
139/13 139/14
139/20 140/6
142/24 143/5 143/8
143/11 143/14
143/15 154/2 171/1
173/19 179/16
202/4 202/4 206/16
207/8 208/20
214/12 214/15
215/4 227/12
234/24
lines [25] 46/19
62/9 62/13 62/23
84/4 84/6 84/7

L

USCA11 Case: 22-11150 Document 53-101 Date Filed: 11/30/2022 Page: 119 of 254
lines... [18]
 88/24 89/23 90/5
 90/7 91/1 91/4
 104/24 105/4
 124/18 125/13
 153/8 157/11
 157/14 157/16
 169/19 179/14
 189/20 225/19
link [8] 54/24
 55/6 56/15 67/25
 68/5 68/9 124/22
 236/14
linked [2] 93/17
 237/8
LinkedIn [5] 24/19
 24/24 25/21 25/23
 26/21
links [2] 124/20
 237/10
liquidate [1]
 157/4
list [37] 17/1
 23/5 55/11 56/19
 76/13 148/2 148/5
 148/7 148/8 148/12
 148/23 149/3
 149/11 149/13
 149/19 149/20
 149/25 150/3 150/3
 150/5 152/8 153/5
 153/7 153/8 153/9
 153/19 154/17
 155/7 159/1 159/1
 159/2 159/13 167/3
 171/25 206/17
 223/20 234/16
listed [12] 8/15
 45/4 173/16 173/25
 177/5 199/19
 209/12 210/18
 215/12 216/19

216/19 219/10
listing [1] 73/24
listing [1] 227/8
lists [3] 57/8
 118/8 118/17
literally [3]
 132/12 167/3
 214/14
litigation [11]
 40/2 66/4 66/5
 93/19 148/1 148/23
 151/13 172/5
 173/11 176/10
 182/19
little [26] 6/7
 7/6 20/16 22/21
 29/18 35/25 51/25
 55/7 56/9 115/11
 122/20 134/1
 134/11 134/13
 139/19 140/4 162/5
 162/6 171/13
 177/16 207/24
 213/10 216/22
 219/25 221/8
 222/13
live [1] 238/23
LLC [4] 1/4 18/17
 151/19 240/4
LLP [2] 1/12 1/19
load [1] 43/4
loaded [1] 80/10
loan [4] 103/5
 104/4 142/18
 169/17
located [1] 165/9
location [1]
 176/13
locations [1]
 155/19
lockbox [4] 111/8
 111/11 111/12
 111/22
locked [2] 121/20

121/21
local [1] 216/14
log [3] 124/2
 124/3 127/14
logo [5] 35/4
 35/25 213/17
 215/21 215/22
London [2] 133/19
 133/20
long [11] 51/18
 52/4 56/5 87/10
 87/15 122/17
 122/21 122/24
 176/21 243/4
 243/10
long-distance [2]
 87/10 87/15
longer [2] 92/16
 93/17
look [32] 16/1
 28/16 32/15 35/12
 56/3 66/3 76/17
 96/12 96/16 98/1
 100/19 103/1
 104/17 104/19
 105/18 105/23
 105/25 123/15
 144/5 147/13
 161/22 170/10
 183/25 187/15
 193/8 204/13 209/5
 213/3 218/13 228/2
 228/5 240/1
looked [18] 10/8
 11/4 19/14 46/4
 61/3 61/22 61/25
 96/20 105/17
 108/17 111/16
 158/25 187/13
 188/22 204/11
 211/17 212/14
 219/2
looking [25] 10/5
 14/4 15/17 22/16

L

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page: 180 of 254
looking... [21]
 29/2 34/2 35/1
 41/18 47/25 48/4
 62/22 82/12 108/18
 110/2 110/6 136/19
 138/22 139/15
 143/14 157/2
 182/17 196/12
 211/15 222/8
 228/14
looks [5] 32/14
 103/19 106/14
 110/11 149/10
losing [1] 229/17
lot [22] 7/4 34/18
 44/13 69/23 69/24
 88/16 92/5 95/19
 112/4 120/13
 120/19 124/19
 127/15 127/15
 127/16 132/17
 159/18 208/8
 208/10 229/15
 231/14 231/18
lots [4] 44/24
 71/6 179/3 179/3
Louis [2] 66/12
 67/4
loved [3] 69/17
 79/10 79/12
loves [1] 95/15
LTD [2] 36/4
 198/15
lunch [7] 5/21
 107/5 107/6 107/8
 107/12 107/15
 109/23
Lynam [1] 55/24
Lynn [4] 6/20 7/2
 18/21 19/2

M

MacGregor [19]

58/17 59/9 59/19	137/10 166/2
60/2 61/25 113/5	171/19 176/16
113/11 132/21	179/8 193/8 194/18
133/18 230/19	201/24 204/13
230/22 230/25	213/1 218/12 219/2
231/2 231/7 231/14	220/17 236/4
232/2 232/10	240/21 240/22
232/10 232/16	240/23 242/24
machine [6] 7/25	makes [3] 67/20
86/3 124/3 124/5	171/9 232/11
170/12 247/8	making [4] 26/18
machines [6]	74/4 166/10 242/2
118/22 127/15	Malburang [1]
127/15 155/18	155/14
155/20 175/8	man [1] 10/17
mad [3] 185/17	managed [1] 158/3
187/15 188/25	Manu [2] 221/21
madam [1] 74/8	222/9
made [23] 5/10 9/1	many [19] 48/11
17/10 33/14 58/24	48/17 49/19 68/20
80/8 93/4 96/17	84/1 111/14 121/5
109/2 123/4 123/8	121/7 121/9 121/10
124/7 157/1 158/12	142/17 165/14
164/14 166/4 166/6	166/8 166/8 172/2
193/16 217/6	217/17 226/22
226/19 242/3	243/7 245/11
244/15 245/1	March [21] 15/5
Magistrate [1]	38/9 47/9 47/19
152/9	55/5 55/6 62/9
mailing [3] 55/11	62/13 63/2 70/10
57/8 76/13	84/4 84/12 125/13
main [1] 177/23	125/20 133/1
maintain [1] 29/22	133/17 135/9
maintained [3]	146/25 156/2
134/1 134/11	224/13 231/4
134/13	mark [9] 10/13
majority [1] 13/14	91/23 97/8 97/8
make [35] 8/25	97/10 114/17 115/2
15/1 39/13 40/8	115/21 241/2
52/10 53/22 58/4	Marquette [1] 70/2
64/23 78/23 86/19	marriage [4] 8/10
92/19 110/15 129/3	68/22 69/7 69/11
130/15 131/12	Marty [1] 92/16
136/6 136/10	master's [1] 8/24

M

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 18 of 254
match [4] 164/7
215/8 215/14
215/18
matching [1] 215/7
math [1] 70/12
matter [5] 167/10
167/12 224/2 224/9
224/21
matters [1] 6/6
Matthews [1]
113/18
Max [2] 55/24
57/12
may [34] 6/12
14/10 20/5 76/16
88/15 101/3 101/21
109/25 112/2 114/1
117/17 131/6
131/14 170/15
170/16 174/25
183/8 183/18 186/2
187/6 187/18 188/7
188/11 189/4 228/3
229/12 237/20
239/1 240/11
240/21 241/22
242/8 242/9 244/21
May 13th [1] 183/8
May 2011 [1] 76/16
May 22nd [2] 101/3
101/21
May 8th [1] 186/2
May declaration [1]
187/6
Mayaka [13] 204/22
205/14 205/18
205/21 205/22
206/6 208/2 208/23
209/19 209/25
210/10 211/16
212/15
maybe [5] 82/12

131/14 139/14
166/10 184/22
Mazer [1] 108/6
MCGOVERN [21] 1/20
4/5 7/15 7/18 90/7
122/6 131/9 152/22
164/9 165/1 166/15
227/12 227/17
228/10 229/5
236/14 237/4 239/3
240/13 245/6
245/14
McGovern's [2]
9/16 244/25
McLaughlin [1]
56/3
McMaster [2] 14/21
32/3
me [117] 3/6 6/4
6/9 8/12 8/12 8/19
9/4 9/5 9/12 9/14
10/24 13/7 17/14
18/4 18/14 20/25
27/20 28/21 34/16
44/14 49/12 49/13
50/10 55/6 61/2
62/21 63/20 68/24
68/25 69/1 69/8
69/12 69/15 69/16
69/24 70/5 71/14
74/21 77/22 78/23
79/4 79/8 80/12
82/14 83/8 84/20
85/1 86/23 87/19
89/2 91/21 92/6
92/16 95/14 97/4
101/4 105/18
107/16 107/16
107/17 108/13
108/18 108/24
110/23 116/25
117/22 117/23
119/1 122/13 127/4
127/10 127/18
128/12 128/13
128/15 129/15
130/3 130/16
136/16 137/10
138/4 140/25 141/5
144/23 148/19
149/15 155/23
158/7 158/12 162/2
164/14 166/6
175/21 175/21
182/5 190/21 191/1
193/17 197/16
198/11 201/2 201/3
201/20 204/2
214/16 215/18
218/9 220/19 221/2
221/2 221/3 221/5
230/15 232/11
232/13 233/10
235/19
mean [25] 27/8
38/17 53/2 69/24
117/7 117/13 121/2
123/4 136/15 156/6
158/18 162/1 162/1
162/1 165/21
166/18 180/16
182/7 198/7 232/11
233/11 241/3
241/25 244/2
244/25
meaning [4] 46/23
151/14 176/21
220/22
means [8] 27/3
123/9 156/8 156/20
156/22 158/5 158/7
165/11
meant [4] 53/4
78/5 134/6 224/9
meantime [1] 223/7
measure [1] 109/2
mechanism [1] 30/4
media [8] 137/19

M	1/20 4/8 152/16 met [2] 39/23 40/15 metadata [3] 121/25 193/1 194/19 MetaNet [2] 63/21 161/1 method [1] 116/6 MGA [1] 107/22 Miami [7] 1/14 1/18 1/24 1/24 247/15 247/18 247/18 Michael [2] 70/2 223/8 Michele [1] 49/10 middle [7] 7/6 24/22 24/25 58/19 170/14 176/9 230/14 midnight [2] 210/4 210/5 might [6] 126/1 174/6 174/21 215/13 235/19 245/11 Miller [2] 16/2 16/20 million [37] 23/10 40/9 42/4 56/25 109/1 138/7 138/13 139/5 139/12 140/3 140/7 140/16 142/10 142/22 143/18 143/24 145/12 145/18 147/8 147/24 179/22 189/25 193/9 200/8 200/17 200/19 212/24 213/1 217/2 219/3 219/23 219/25 220/1 220/13 221/8 221/10 222/13	millions [2] 8/21 10/2/4 Page: 182 of 254 mind [1] 74/9 mine [26] 6/5 7/20 10/11 10/22 11/1 17/23 18/7 19/23 23/7 23/15 23/21 28/13 44/17 55/17 95/8 118/9 118/10 123/23 155/10 155/23 155/24 157/7 176/25 177/8 178/10 234/3 mined [58] 7/24 10/23 11/8 11/21 12/4 12/7 17/22 17/25 18/1 18/3 18/5 18/9 18/11 18/12 18/13 24/5 24/9 28/4 30/13 57/19 58/1 58/5 58/6 93/23 94/1 95/17 111/21 114/15 138/3 138/10 148/2 148/5 148/7 148/12 148/23 149/15 149/16 150/1 150/4 153/8 155/7 155/11 155/24 159/2 159/7 159/13 159/13 159/15 161/7 161/16 189/25 201/2 201/2 217/7 219/4 219/21 219/21 220/1 minimize [2] 27/9 198/9 minimum [2] 145/25 242/21 mining [38] 7/9 7/10 8/3 9/17 9/23 10/4 18/18 23/18 23/25 24/1 24/4
USCA11 Case: 22-11150 media... [7]	137/20 230/24 231/16 232/2 232/19 234/1 235/16 meet [1] 235/9 meeting [9] 12/25 16/4 16/7 17/8 17/10 29/3 38/20 138/23 235/11 member [2] 75/1 79/9 members [5] 6/22 80/6 83/19 83/21 150/8 mention [4] 13/9 24/22 162/3 199/18 mentioned [8] 4/20 31/10 91/22 94/14 122/7 147/7 204/3 247/9 mentioning [1] 112/20 mentions [4] 24/25 103/16 119/17 184/8 merit [6] 73/2 73/4 74/15 74/16 74/16 164/23 message [20] 14/15 24/19 25/14 25/17 51/7 76/12 120/5 160/25 163/24 165/13 169/11 169/15 171/3 171/6 171/21 172/22 206/3 206/13 207/3 214/18 messages [6] 63/24 119/10 163/20 170/3 170/7 172/3 MESTRE [4] 1/19	137/20 230/24 231/16 232/2 232/19 234/1 235/16 met [2] 39/23 40/15 metadata [3] 121/25 193/1 194/19 MetaNet [2] 63/21 161/1 method [1] 116/6 MGA [1] 107/22 Miami [7] 1/14 1/18 1/24 1/24 247/15 247/18 247/18 Michael [2] 70/2 223/8 Michele [1] 49/10 middle [7] 7/6 24/22 24/25 58/19 170/14 176/9 230/14 midnight [2] 210/4 210/5 might [6] 126/1 174/6 174/21 215/13 235/19 245/11 Miller [2] 16/2 16/20 million [37] 23/10 40/9 42/4 56/25 109/1 138/7 138/13 139/5 139/12 140/3 140/7 140/16 142/10 142/22 143/18 143/24 145/12 145/18 147/8 147/24 179/22 189/25 193/9 200/8 200/17 200/19 212/24 213/1 217/2 219/3 219/23 219/25 220/1 220/13 221/8 221/10 222/13

M

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 183 of 254
mining... [27]
 24/13 24/23 25/1
 26/14 26/18 27/11
 27/25 29/22 44/13
 44/16 44/21 94/2
 94/4 94/8 94/10
 94/10 94/16 95/9
 95/10 95/11 95/22
 96/2 98/19 115/21
 120/21 160/13
 238/15
minus [2] 93/13
 147/15
minute [11] 13/5
 26/22 56/25 60/12
 60/14 113/25
 117/18 126/4 130/3
 162/10 162/13
minutes [8] 3/4
 16/6 72/7 162/16
 162/19 230/5
 230/16 235/24
mischaracterizes
[6] 53/17 120/24
 178/19 200/10
 217/24 226/10
misconstrue [1]
 199/9
misrepresent [1]
 97/24
missed [2] 159/4
 241/2
missing [2] 87/9
 87/14
misstated [1]
 111/14
Misstates [4] 14/7
 122/10 178/17
 207/20
misstating [1]
 135/2
mistake [1] 167/20

misunderstood [1]

165/1
MJF [1] 115/21
module [2] 107/1
 162/5
Mohrt [1] 65/16
moment [15] 20/19
 26/17 32/7 54/19
 63/20 65/3 71/13
 83/22 125/1 143/1
 176/4 201/7 204/19
 230/3 235/14
Monday [4] 38/14
 144/13 210/3 210/6
monetary [1] 8/20
money [18] 8/14
 9/11 69/5 135/15
 136/11 157/1
 159/19 160/9
 169/16 169/16
 169/16 219/15
 220/16 229/8
 229/14 229/18
 229/20 239/19
month [2] 147/2
 203/15
monthly [1] 216/12
months [5] 12/3
 57/3 90/23 221/6
 222/10
more [31] 19/19
 34/19 36/9 36/11
 53/4 56/9 70/16
 72/12 79/11 80/12
 82/15 83/9 85/1
 86/23 87/20 108/19
 108/20 116/8
 117/22 157/12
 176/7 177/17 208/8
 208/10 217/15
 229/8 229/20
 229/20 230/8
 232/16 239/19
morning [21] 3/2

3/5 3/18 3/20 4/3
 4/4 4/6 4/18 4/10
 4/15 6/2 6/4 6/15
 6/16 228/6 236/4
 236/8 236/15 245/7
 245/20 246/3
most [2] 68/19
 92/24
mother [5] 44/23
 156/11 156/11
 156/14 182/5
mother's [1]
 226/16
motion [5] 96/6
 238/21 239/23
 242/25 243/9
motions [1] 243/7
move [22] 43/6
 75/11 96/3 110/21
 138/1 160/18
 170/25 171/11
 171/15 189/3 192/5
 194/9 196/1 196/4
 198/10 226/20
 228/8 229/5 230/11
 230/13 238/17
 244/7
moved [5] 32/4
 90/21 92/7 115/9
 167/15
moving [3] 27/15
 27/19 218/21
MR [7] 2/5 4/25
 39/13 167/11
 167/21 227/5
 241/21
Mr. [69] 4/13 4/20
 18/17 19/16 22/2
 25/20 27/21 29/11
 29/15 30/3 30/6
 30/7 30/7 39/4
 41/2 42/3 42/12
 42/25 44/5 50/15
 50/16 50/19 52/1

M

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 184 of 254

Mr. [46] 61/13
67/23 74/4 74/25
75/3 101/24 108/21
109/10 111/7
122/17 122/18
122/21 127/14
138/5 140/5 140/6
140/8 140/8 142/16
142/19 143/5 145/4
146/13 146/15
152/22 163/3
163/11 163/16
163/18 164/14
164/18 165/15
166/5 166/12
167/16 168/7
179/17 179/19
179/24 180/8 188/7
199/25 200/1
208/23 225/14
236/22

Mr. Amit [1] 4/13

Mr. Antonopoulos [1] 111/7

Mr. Brenner [2]
167/16 168/7

Mr. Dave [1] 18/17

Mr. David [1]
199/25

Mr. Dolevski [1]
225/14

Mr. Freedman [10]
61/13 74/4 163/3
163/11 164/14
165/15 166/5
166/12 188/7
236/22

Mr. Freedman's [1]
164/18

Mr. Kleiman [20]
19/16 22/2 30/7
30/7 41/2 42/12

42/25 44/5 50/15
50/16 52/1 67/23
101/24 122/18
146/13 146/15
179/17 179/24
180/8 200/1

Mr. Kleiman's [3]
42/3 127/14 179/19

Mr. Kleimans [1]
50/19

Mr. Mayaka [1]
208/23

Mr. O'Hagan's [2]
27/21 138/5

Mr. O'Mahoney [11]
29/11 29/15 30/3
30/6 39/4 140/5
140/8 142/16
142/19 143/5 145/4

Mr. Rivero [3]
122/17 122/21
152/22

Mr. Sommer [2]
140/6 140/8

Mr. Sullivan [5]
4/20 74/25 75/3
108/21 109/10

Mr. Tyler [1]
25/20

Mr. Warren [1]
163/18

Mr. Warren's [1]
163/16

Ms [9] 7/1 65/3
131/11 133/14
168/10 183/3 194/2
198/21 211/12

Ms. [309]

Ms. Dorian [1] 4/1

Ms. Lynn [2] 6/20
7/2

Ms. McGovern [19]
7/15 7/18 90/7
122/6 131/9 152/22

164/9 165/1 166/15
207/12 227/17
228/10 229/5
236/14 237/4 239/3
240/13 245/6
245/14

Ms. McGovern's [2]
9/16 244/25

Ms. Nguyen [7]
21/10 22/17 42/15
42/21 43/23 44/1
180/2

Ms. Ramona [1]
21/19

Ms. Uyen [4] 20/17
21/16 43/16 43/18

Ms. Vela [271]

Ms. Watts [1]
12/22

Ms. Wright [1]
6/24

much [8] 65/18
78/16 129/15
161/12 166/8

236/18 243/19
245/15

muddy [2] 137/9
137/14

multi [3] 94/16
229/23 237/3

multi-billionaire [2] 229/23 237/3
multi-sig [1]
94/16

multiple [9] 15/19
19/12 135/8 175/3
181/12 202/6 217/4
219/7 241/1

munge [1] 124/17

Musk [1] 161/22
must [4] 111/4

141/13 170/13
240/6
my [197] 8/1 8/10

M

my... [195] 8/10
 8/12 8/16 17/9
 21/21 24/24 26/2
 26/4 27/6 27/8
 34/19 44/23 44/23
 45/18 46/23 47/13
 47/13 47/16 49/15
 55/23 55/24 57/10
 67/20 68/19 68/22
 68/22 69/2 69/2
 69/7 69/10 69/11
 69/11 69/12 69/14
 70/5 71/3 71/17
 73/7 77/21 79/9
 79/17 80/12 80/23
 80/23 82/15 83/9
 83/11 83/20 83/23
 84/19 85/1 86/23
 87/6 87/12 87/20
 88/5 90/14 93/2
 93/13 95/13 96/1
 99/14 99/15 100/5
 100/9 100/9 100/10
 102/11 102/16
 102/16 104/22
 106/14 106/17
 106/21 106/22
 106/24 110/10
 110/11 113/21
 118/2 118/5 118/6
 118/19 118/23
 118/25 122/2 122/2
 122/3 122/3 127/5
 127/17 128/10
 129/6 129/13
 129/14 130/1
 134/25 135/10
 141/1 141/5 141/9
 141/14 141/17
 148/7 148/9 150/9
 150/11 150/12
 150/12 153/12

155/14 155/15

156/6 156/11
 156/11 156/11
 156/13 156/15
 156/17 156/18
 158/9 158/15
 158/16 158/17
 158/20 159/20
 159/25 161/6
 161/24 161/24
 164/25 166/4
 167/13 174/19
 175/21 177/3
 178/11 181/9
 181/19 182/3 182/4
 182/5 183/18 186/2
 190/22 190/23
 190/24 191/3 191/3
 195/24 201/5
 202/12 204/1
 206/12 209/3 209/4
 209/4 212/23
 212/25 214/5
 215/10 215/10
 216/17 217/17
 218/19 218/19
 218/20 218/21
 218/21 218/22
 219/13 219/18
 219/19 220/16
 220/16 220/18
 220/22 220/25
 220/25 221/1 221/4
 223/11 224/2 224/8
 224/20 224/23
 226/15 226/16
 226/16 226/17
 226/17 231/18
 234/2 247/11
 247/14
myself [7] 8/15
 8/23 30/8 155/11
 156/5 171/23
 216/17

mysteriously [2]

107/17 127/18

N**Nakamoto [33]**

45/11 47/18 53/22
 55/8 55/18 56/8
 56/10 57/17 68/17
 69/19 71/20 72/18
 75/17 75/20 76/1
 76/4 76/8 76/11
 76/12 78/4 88/10
 89/4 120/20 126/24
 127/24 128/18
 133/23 134/6
 160/13 219/4 231/1
 231/9 232/24

Nakamoto's [2]

45/16 90/19
name [31] 15/17
 29/20 31/9 38/17
 39/10 45/8 45/13
 56/2 64/3 80/23
 85/10 117/25
 155/17 157/5
 173/10 173/14
 173/15 174/6 174/8
 174/9 176/11
 176/12 177/7 182/3
 182/4 184/16 205/2
 206/9 211/7 216/21
 233/22

name's [1] 173/12

named [3] 65/16
 182/5 205/14

names [3] 100/16
 121/24 169/13

naming [1] 181/10

nature [2] 181/11
 233/16

nChain [6] 94/3
 99/16 232/3 232/19
 233/11 234/2

nCrypt [5] 12/21

N

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 186 of 254
ncrypt... [4] 14/5
 14/17 15/9 15/16
nearly [4] 8/13
 8/15 8/22 87/2
necessarily [1]
 172/12
necessary [3]
 152/7 239/21
 242/22
necessity [1]
 239/6
need [24] 4/17
 60/18 74/1 94/22
 94/23 99/8 99/20
 99/23 99/24 100/2
 109/15 132/6
 136/13 140/9
 171/10 171/19
 172/11 181/16
 209/3 236/15
 239/14 242/24
 244/7 245/17
needed [4] 100/1
 111/22 147/15
 160/5
needs [4] 100/4
 100/6 124/12
 244/15
negotiate [2]
 121/22 157/3
net [14] 236/25
 237/3 237/6 237/16
 238/18 238/24
 239/5 240/10 241/8
 241/21 242/7
 242/22 244/6 245/2
network [1] 95/22
Nevada [2] 107/25
 108/1
never [21] 53/23
 63/15 69/13 72/22
 83/13 85/21 89/19

92/8 92/21 95/6
 111/22 118/19
 118/22 124/10
 124/11 124/14
 124/15 128/15
 134/4 166/14 178/8
new [15] 15/14
 32/4 92/7 92/12
 96/20 97/6 108/16
 114/21 123/10
 189/17 194/18
 210/1 212/24 214/3
 214/4
news [2] 5/5 5/6
next [35] 16/11
 17/16 18/16 19/17
 36/8 36/9 37/9
 42/8 46/5 82/6
 114/1 131/1 131/22
 137/5 137/11
 143/13 143/14
 144/9 144/21
 152/20 176/7
 176/20 176/20
 180/5 189/3 196/22
 197/15 207/3
 207/23 208/17
 210/22 211/2
 211/12 211/24
 212/1
Nguyen [13] 20/17
 20/20 21/10 21/16
 22/17 42/15 42/21
 43/16 43/19 43/23
 44/1 44/1 180/2
nice [1] 75/4
Nick [7] 232/22
 232/25 233/1
 233/25 234/9
 234/25 235/1
nine [1] 12/2
no [316]
nobody [2] 90/20
 112/11

node [2] 94/5 94/7
nominal [1] 23/23
nominee [2] 197/23
 211/10
non [4] 134/17
 172/15 242/14
 242/17
non-party [2]
 242/14 242/17
non-preservation [1] 134/17
non-signed [1]
 172/15
none [7] 27/6
 122/15 174/15
 175/21 179/1
 193/19 215/11
nonparty [1] 35/19
nonresponsive [1]
 96/4
nope [2] 110/5
 146/10
North [2] 1/24
 247/18
not [360]
note [3] 35/12
 106/8 108/13
noted [5] 33/8
 105/24 141/11
 181/7 191/23
notes [4] 12/25
 17/7 17/9 247/11
nothing [10]
 129/25 133/8
 134/16 164/22
 219/21 221/4 232/7
 237/8 237/10
 239/16
notice [5] 150/17
 151/9 151/23 152/2
 211/9
notifies [1] 152/6
November [15] 1/5
 24/3 24/5 24/11

N

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 186 of 254
November . . . [11]
24/14 55/22 55/23
55/24 56/14 56/15
73/6 113/11 171/2
247/9 247/15
now [60] 14/4
15/13 22/20 25/21
26/21 42/8 53/14
55/12 56/21 69/12
72/16 78/16 79/5
83/20 87/11 89/6
94/3 94/11 94/13
95/19 96/16 102/17
105/19 107/2 110/3
112/12 127/13
131/17 136/9
136/21 137/25
148/22 157/2
158/17 158/20
158/23 162/6 164/2
166/6 181/11 182/7
185/25 188/15
200/5 201/15
201/23 206/11
209/11 209/24
215/16 217/2
217/13 224/2 224/8
224/20 229/8
229/23 235/22
238/8 241/13

nowhere [1] 225/4
number [40] 15/23
16/23 28/1 29/21
47/9 50/2 90/10
91/8 105/10 105/24
111/22 118/8
123/18 127/3
129/17 153/8
153/23 154/4
154/15 155/18
156/2 156/19 158/5
159/25 163/11

193/13 193/16
193/18 195/15
195/16 198/24
203/19 207/12
207/13 207/14
207/15 213/24
215/3 227/15
231/23

numbered [1]
166/17

O

O'Hagan's [2]

27/21 138/5

O'Mahoney [13]

29/11 29/15 30/3
30/6 39/4 39/13
140/5 140/8 142/16
142/19 142/21
143/5 145/4

oath [4] 6/10 63/3
79/8 157/21

object [12] 33/7

41/9 73/20 126/10
134/18 174/21
212/7 228/25
233/15 237/6
238/13 241/7

object to [1]

174/21

objected [1] 237/5

objection [125]

13/14 13/16 13/16
13/18 14/7 18/22
19/4 19/4 19/24
22/6 22/22 25/5
25/7 28/7 31/14
31/15 33/5 33/8
35/18 39/25 41/7
48/13 50/25 52/20
53/16 58/23 59/4
62/19 62/24 64/15
66/17 71/25 72/3
72/23 73/18 75/6

75/14 77/4 81/7

81/9 84/10 86/15

87/23 89/14 90/3

90/8 91/7 97/20

98/25 101/15

103/21 105/8

109/13 112/25

113/1 116/24 119/7

119/24 119/25

120/23 121/13

122/10 126/8

126/25 127/25

133/11 134/16

141/23 141/24

142/3 146/2 146/2

146/20 149/21

150/22 152/23

153/15 154/22

155/4 157/18

160/20 162/17

163/5 164/21 167/6

167/16 173/3 173/4

175/9 177/11

177/14 178/17

182/10 184/10

184/24 185/6

186/22 191/18

191/19 192/11

193/3 193/10

193/22 194/3 194/9

196/5 196/6 200/10

203/6 204/6 205/6

207/20 208/12

217/23 218/1 219/6

222/2 222/3 223/16

226/9 229/10

229/25 231/10

232/4 233/12

objections [2]

41/12 228/3

objectively [1]

243/2

obtain [1] 109/9

obtained [1]

O

obtained... [1]	55/10 53/13 58/4 71/3 73/7 75/9 84/25 100/5 128/13 187/17 187/19 196/1 208/3 216/10 216/15 219/3 232/3 232/19	135/21 136/4 140/23 141/7 141/10 141/11 141/12 141/13 141/14 141/15 142/9 142/16 144/14 145/1 156/25 178/14 190/18 190/20 191/2 204/2 207/18 220/20 223/8 224/2 225/15
obtaining [1]	97/7	offer [34] 13/12 22/4 25/3 31/13 33/4 35/16 41/6 50/24 58/21 64/13 66/15 77/2 81/5 86/13 98/23 101/13 103/20 112/23 116/22 119/2 119/21 131/4 133/9 146/18 150/20 153/13 177/10 182/8 185/4 186/20 205/4 212/6 221/25 223/14
obviate [1]	244/6	OFFERED [1] 2/6 offering [1] 191/16
obviously [2]	107/4 240/22	office [78] 11/7 12/11 12/23 13/1 14/13 15/5 15/8 15/18 16/2 16/20 17/7 28/12 28/17 29/3 29/15 30/20 31/5 31/25 32/1 32/13 32/15 33/2 33/14 33/23 34/3 34/11 34/12 34/15 35/4 35/9 35/25 38/22 39/4 40/18 41/19 44/24 45/24 46/17 47/10 47/14 47/14 47/16 47/20 57/22 61/4 61/11 86/3 97/17 98/21 121/20 135/20
occurred [1]	157/10	officers [1] 165/22
October [35]	24/3 24/10 24/14 54/25 55/10 56/16 56/24 57/18 99/6 170/11 170/13 170/21 186/1 186/8 186/17 192/22 195/18 195/23 197/2 197/9 203/19 206/6 207/6 209/11 209/19 209/24 213/18 216/1 216/8 216/25 217/15 217/17 217/20 218/11 218/23	official [6] 32/1 34/12 35/4 35/8 40/17 41/18
October 10th [1]	99/6	officially [1] 181/9
October 16th [1]	207/6	offset [1] 36/15
October 17th [5]	209/11 209/19 216/8 216/25 218/23	offshore [9] 17/23 17/25 18/2 18/3 18/6 18/9 18/11 18/12 18/13
October 2008 [1]	57/18	often [1] 156/12
October 23rd [3]	186/1 186/8 186/17	oh [9] 46/18 56/1 97/2 98/10 141/15 150/15 167/22 167/25 195/10
October and [2]	56/24 170/21	okay [71] 13/3 20/16 20/19 21/10 23/2 23/21 24/7 25/15 28/5 28/17 29/16 31/24 36/11 38/19 40/23 42/7 42/9 42/10 49/14 50/18 53/20 54/3 55/2 80/2 82/7 82/9 86/12 86/18
October of [1]	195/23	86/21 87/5 88/6
October or [1]	24/14	90/9 96/17 98/2
October to [1]		98/11 101/7 103/14 109/19 110/21

O

USCA11 Case: 22-11150 Document 53-10 Date Filed: 12/30/2022 Page: 189 of 254
okay... [32] 116/9
125/23 128/2 138/3
138/4 143/21
157/17 157/18
159/7 162/24 167/7
167/24 168/1 177/9
177/17 178/3 182/7
186/16 187/9
187/16 188/19
206/11 211/2 213/3
213/15 214/17
215/17 225/12
230/19 234/5
245/17 246/2
old [1] 182/7
older [1] 124/21
omissions [1] 16/8
once [8] 6/5 52/14
121/25 206/23
209/2 209/21
216/15 245/9
one [130] 4/24
5/18 6/7 11/14
14/18 16/1 16/1
16/23 17/14 19/19
34/2 36/9 36/11
37/17 38/8 48/12
54/19 55/12 59/15
62/11 62/15 63/20
64/21 68/18 69/4
72/12 75/4 78/17
78/22 79/12 83/10
83/21 84/1 84/5
88/12 88/12 88/17
89/24 91/5 92/14
94/13 94/14 94/21
94/21 95/4 98/15
102/4 102/24
104/11 104/11
105/1 107/5 107/19
108/9 115/11
117/17 117/17

121/20 123/10

124/1 125/17 126/12
126/4 127/4 130/3
130/14 131/8 133/3
137/6 137/10 138/7
138/14 141/11
147/6 154/16
154/20 156/10
156/22 157/12
157/15 157/17
158/13 160/6
162/23 167/9
167/12 171/10
172/1 173/18
174/11 176/3 176/7
176/15 176/19
176/20 176/20
186/7 192/19
193/13 193/21
198/20 200/25
202/14 208/3 210/3
211/9 211/19
211/20 211/22
211/22 216/12
216/12 216/22
217/4 217/15
218/20 218/21
218/21 219/23
219/24 220/1
220/15 221/10
221/10 221/14
221/14 232/22
241/14 241/18
244/23
one's [1] 119/1
one-hour [1] 107/5
One-off [1] 208/3
one-time [1]
216/22
ones [10] 8/13
71/7 79/21 128/14
159/22 164/6 172/3
175/19 177/3 201/5
only [31] 21/13

23/23 24/17 32/8

51/8 58/13 64/3

74/25 78/20 79/6

93/2 93/6 97/10

100/21 115/2

115/18 116/13

126/21 129/3

149/14 156/6

172/25 177/12

195/21 226/24

236/19 236/23

241/14 243/13

244/2 245/4

onwards [1] 208/4**opening [5]** 7/12

7/15 9/16 54/10

122/7

operate [1] 201/24**operations [1]**

219/13

operator [1] 95/12**opponent [2]** 5/5

5/14

opportunity [15]

5/11 73/24 75/10

163/6 206/11

215/15 228/2

228/16 229/2 229/5

229/6 238/16

239/22 242/6

243/19

opposing [2]

180/23 223/3

opposite [3] 18/8

121/2 121/2

order [18] 3/1

53/7 59/18 93/9

109/3 148/14

148/18 149/12

149/20 150/1

151/24 152/3 153/6

163/22 163/23

175/6 203/10 219/2

ordered [7] 135/19

O

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 190 of 254
ordered... [6]
 148/2 148/5 148/11
 148/20 148/22
 152/9
ordering [3] 53/8
 53/14 53/14
orders [1] 108/25
Organisation [3]
 232/23 234/1
 234/10
organization [1]
 94/25
organizations [1]
 235/16
organizer [1]
 210/19
original [19]
 15/21 16/1 76/8
 76/11 77/24 82/8
 86/20 86/22 87/4
 87/18 87/25 90/21
 133/6 133/19 134/1
 134/11 149/13
 189/8 190/17
originally [4]
 30/24 38/23 39/6
 145/6
other [62] 6/6
 15/22 17/20 23/5
 44/24 55/14 57/11
 58/8 59/21 68/16
 69/19 70/17 70/20
 74/24 83/23 89/4
 90/15 100/10
 100/17 111/24
 118/22 121/21
 124/14 124/16
 125/10 128/18
 147/12 149/18
 156/8 158/20
 159/24 159/25
 164/3 175/19

175/20 176/19
 177/24 184/21
 198/20 201/23
 215/9 215/9 218/7
 219/16 221/13
 223/23 224/3 224/9
 224/21 226/7
 226/13 228/3
 229/16 234/3
 236/16 236/19
 236/22 236/23
 237/3 241/20 242/7
 243/22
others [14] 27/6
 39/23 40/5 55/21
 88/11 92/16 93/11
 94/5 94/11 160/2
 160/9 228/14
 232/21 244/18
Otherwise [1]
 166/19
our [24] 4/1 4/13
 5/1 13/15 16/7
 27/8 36/13 69/5
 86/3 121/18 121/20
 126/9 131/14
 135/23 135/24
 145/24 162/18
 164/13 206/17
 208/25 216/21
 216/21 216/24
 216/24
ourselves [2]
 20/19 188/20
out [68] 8/1 8/15
 9/3 9/25 26/22
 36/16 37/7 50/7
 56/18 57/10 65/3
 79/18 88/1 90/14
 90/17 97/4 99/9
 107/24 108/3
 111/12 114/1
 116/17 121/20
 121/21 126/23

127/23 128/17
 129/21 131/16
 133/22 137/4
 139/19 140/20
 141/8 143/1 154/9
 160/10 170/9
 171/19 178/22
 182/2 183/15
 184/13 187/3 187/3
 190/22 196/24
 197/20 198/12
 199/11 199/17
 199/19 201/19
 202/1 205/16
 206/24 208/24
 210/21 213/10
 213/12 228/24
 229/4 230/22
 230/25 231/9
 231/21 232/24
 243/12
outing [1] 230/24
outside [8] 73/14
 73/15 160/3 201/5
 232/23 234/1
 234/10 236/3
outweighs [1]
 240/17
over [34] 5/21
 20/16 20/20 20/25
 22/21 27/4 27/7
 48/17 56/8 69/11
 75/16 75/17 94/7
 117/14 124/16
 124/17 134/8
 145/19 156/17
 175/2 175/7 176/7
 178/11 178/23
 192/21 220/13
 220/22 221/2 221/8
 221/10 222/13
 228/22 242/14
 243/6
over-inclusive [1]

O

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 181 of 254
over-inclusive...

[1] 228/22

overly [1] 90/6

overruled [41]

13/18 14/9 20/2
22/23 25/7 28/10
31/17 33/8 35/20
40/3 41/12 48/18
52/23 62/24 72/3
73/19 87/24 103/24

120/3 120/25

121/15 122/12

126/15 127/2 146/3

149/23 151/1

175/11 178/21

184/12 184/25

191/24 192/13

193/12 204/8

208/15 212/9 219/8

229/12 231/12

232/8

overseas [8] 10/12

10/22 10/23 11/2

23/24 159/19 160/6

160/11

overwrite [1]

132/10

overwriting [3]

130/25 131/24

132/15

overwritten [1]

127/20

own [17] 11/14

15/20 38/6 40/7

93/20 103/1 112/11

122/6 138/16

156/22 159/8

171/24 177/23

177/24 178/1

181/19 220/6

owned [12] 15/21

79/16 153/12

155/20 155/20

155/21 156/7

157/25 190/25

219/16 221/13

238/8

owner [1] 190/4

owners [5] 197/19

197/25 198/3 198/5

198/7

ownership [4]

120/21 158/14

225/3 225/21

owning [1] 219/3

owns [6] 15/7

15/15 15/22 157/6

178/3 178/4

P

p.m [11] 107/7

107/9 107/9 109/20

162/12 162/25

162/25 167/14

168/14 236/9 246/4

P035 [4] 184/2

185/4 187/11 192/3

P036 [5] 186/9

186/12 186/13

186/20 194/7

P042 [2] 100/21

101/13

P045 [3] 50/8

50/10 50/24

P048 [3] 103/2

110/2 110/5

P051 [3] 163/8

163/12 168/19

P091 [2] 221/17

221/25

P112 [2] 24/16

25/3

P117 [2] 66/8

66/15

P119 [3] 76/19

76/21 77/2

P122 [1] 47/22

P127 [8] 18/15

13/12 46/2 46/9

46/10 46/11 225/6

225/8

P129 [2] 146/5

146/18

P138 [1] 51/12

P139 [1] 70/6

P160 [3] 54/7

57/14 61/8

P164 [1] 19/13

P172 [2] 28/18

138/18

P173 [5] 31/2

31/13 32/7 38/12

144/7

P200 [1] 49/6

P212 [2] 21/12

22/4

P236 [1] 234/6

P29 [1] 146/9

P290 [2] 112/15

112/23

P320 [2] 35/6

35/16

P331 [1] 132/17

P333 [3] 132/17

132/17 133/9

P359 [3] 167/21

168/4 235/12

P381 [2] 58/12

58/21

P434 [4] 71/11

71/24 72/10 72/10

P439 [1] 136/18

P446 [2] 150/15

150/20

P459 [1] 98/8

P464 [2] 96/23

114/20

P48 [1] 105/13

P518 [6] 191/11

191/16 192/1

P		
USCA11 Case: 22-11150 P518 ... [3] 192/14 217/21 218/3	51/13 54/8 61/8 62/9 66/13 64/21 70/7 74/8 80/24 81/23 84/4 84/7 84/20 84/25 86/8 86/10 86/20 86/25 88/24 89/23 90/6 91/1 91/4 96/25 97/3 103/8 103/8 103/9 104/6 104/10 104/24 105/6 105/13 110/4 110/5 114/22 115/7 117/23 118/11 125/13 125/20 131/1 131/22 136/19 136/21 137/11 138/24 142/13 142/13 143/2 143/14 143/14 144/16 144/17 144/21 152/20 153/21 154/10 157/11 157/14 176/7 176/7 176/9 179/10 180/6 183/4 183/15 188/20 189/3 190/7 196/13 196/22 197/15 203/16 204/25 205/10 205/11 205/11 210/22 211/3 211/12 211/25 212/1 212/12 213/5 215/2 225/7 227/12 233/9	Panama [3] 29/18 30/4 210/16 paper [10] 36/3 40/20 41/19 130/5 132/2 132/12 132/14 169/10 171/10 215/13 papers [1] 78/15 Papua [1] 32/4 paragraph [29] 11/8 48/21 49/14 61/11 77/23 84/25 97/4 114/22 115/11 115/17 115/20 119/19 133/18 136/22 137/5 137/12 161/4 179/12 183/15 183/18 185/25 186/2 188/5 196/24 197/18 197/21 198/11 198/12 199/23
P522 [2] 204/19 205/4		
P523 [2] 210/15 212/6		
P554 [3] 149/6 153/2 153/13		
P591 [2] 98/9 98/23		
P607 [3] 40/13 41/6 179/7		
P613 [7] 116/12 116/22 119/2 163/4 165/12 172/24 177/10		
P630 [1] 233/3		
P633 [5] 223/2 223/4 223/5 223/14 224/17		
P742 [2] 32/6 33/4		
P822 [3] 180/22 182/8 185/22		
P823 [2] 119/12 119/21		
P853 [3] 63/16 64/6 64/13		
P864 [4] 80/15 81/5 85/23 86/20		
P865 [2] 86/13 86/20		
page [120] 2/3 10/9 11/5 11/23 13/7 16/12 17/16 19/17 20/11 24/22 26/19 29/6 29/8 31/7 32/9 32/21 33/12 34/6 35/11 36/8 36/9 36/11 36/23 37/9 39/1 40/25 41/24 43/14 46/5 46/14 48/9	pages [2] 1/8 247/12	paragraphs [3] 23/3 67/12 196/15 paralegal [2] 4/13 167/13 parameters [1] 57/2 parents [1] 156/13 part [36] 11/17 40/2 42/8 48/12 67/13 68/3 68/8 70/17 70/20 71/19 71/20 73/3 75/25 77/24 78/7 78/22 87/6 87/12 87/14 100/1 109/5 110/12 142/19 147/3 147/11 156/25 165/16 169/7 181/19 202/24 203/24 217/10 217/11 235/8 238/9

P

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 193 of 254
part... [1] 238/10
particular [6]
 48/12 166/17 175/3
 221/16 221/23
 238/7
particularly [2]
 228/2 232/11
parties [19]
 181/13 197/11
 197/13 197/18
 197/24 198/2 198/3
 198/3 198/5 198/6
 198/7 199/6 203/3
 239/22 240/3 243/4
 243/7 244/5 245/19
parties' [2] 5/20
 240/1
partly [2] 94/6
 135/24
partner [3] 49/16
 68/24 135/23
partners [1] 44/17
partnership [15]
 7/19 45/1 53/23
 53/24 54/2 71/21
 72/18 72/19 75/21
 79/15 96/10 97/25
 98/7 120/21 219/4
partnership's [2]
 28/14 98/5
parts [4] 210/2
 218/7 224/4 224/22
party [13] 5/4
 5/14 41/8 94/21
 106/2 108/10
 126/15 135/15
 141/16 152/7 221/7
 242/14 242/17
passed [1] 243/10
passwords [3]
 114/9 165/6 167/3
past [11] 49/15

83/22 89/5 89/11

129/12 129/13
 129/21 129/25
 134/23 158/17
 159/19
paste [1] 102/15
pastor [1] 9/3
patent [1] 181/11
Patrick [2] 12/2
 77/20
pause [14] 59/3
 62/16 84/8 89/25
 91/6 105/3 113/25
 117/20 125/18
 126/3 126/7 176/5
 186/14 228/23
pay [6] 10/17
 108/25 208/18
 212/21 212/23
 219/18
paying [8] 10/17
 97/11 97/18 115/3
 115/19 122/3 157/2
 208/10
payment [9] 100/4
 209/2 210/3 210/4
 210/5 210/10
 210/18 214/24
 215/9
payments [2] 213/2
 216/12
PDF [8] 39/1 71/11
 77/24 78/17 88/20
 142/13 194/19
 215/2
PDFs [1] 126/9
pedantic [1]
 138/16
peer [2] 55/11
 55/11
penalty [3] 182/24
 183/11 196/20
pending [6] 142/2
 142/4 142/5 194/11

202/22 233/18

people [59] 20/24
 21/3 44/20 44/24
 45/6 47/7 47/11
 47/13 56/16 67/7
 67/24 69/24 71/17
 83/23 92/2 92/5
 92/24 93/4 93/12
 94/25 95/1 95/19
 95/23 95/24 95/25
 99/15 99/24 100/1
 100/7 100/15
 100/17 111/25
 118/22 123/22
 127/7 128/10
 128/11 132/5 136/8
 136/11 136/14
 156/12 158/19
 158/22 162/2
 169/14 175/19
 175/20 181/15
 181/15 221/15
 226/20 229/15
 229/15 229/17
 231/15 231/18
 231/20 232/23
people's [1]
 118/25
per [1] 74/1
percent [3] 156/7
 156/8 156/23
perfect [3] 14/2
 37/11 245/15
perfectly [1]
 215/6
perhaps [3] 242/19
 243/24 244/4
period [4] 36/4
 40/20 41/8 41/20
perjury [3] 182/24
 183/11 196/20
Perl [1] 124/13
permissible [1]
 238/24

P	piece [3] 215/13 237/10 238/1 PIN [3] 111/8 111/11 111/22 place [7] 16/15 32/5 38/20 71/8 102/13 102/21 145/19 placed [1] 6/10 places [3] 21/9 55/14 219/16 PLAINTIFF [6] 1/12 2/3 3/23 107/19 242/6 244/1 Plaintiff's [1] 146/22 Plaintiffs [54] 1/5 3/8 3/9 3/19 3/21 3/22 3/24 13/12 22/4 25/3 31/12 35/16 41/5 43/6 50/23 58/21 60/19 64/13 77/2 81/5 86/13 98/23 101/13 103/20 108/11 109/8 109/18 112/23 116/22 119/2 119/21 131/4 133/9 138/2 145/17 146/18 150/20 152/10 153/13 160/18 177/9 182/8 186/20 191/20 196/3 205/4 212/6 221/25 223/18 237/1 239/13 241/15 243/13 245/23 Plaintiffs' [71] 2/7 2/7 2/8 2/8 2/9 2/9 2/10 2/11 2/11 2/12 2/12 2/13 2/13 2/14
USCA11 Case: 22-11150	Document 53-10 Date Filed: 11/30/2022 Page 184 of 254
permission [1] 89/12	
permit [1] 236/1	
permitted [1] 126/16	
person [32] 9/23 10/4 26/3 32/3 56/1 56/6 58/8 58/11 59/20 62/1 62/5 63/10 68/19 74/23 74/24 79/9 79/10 79/11 94/2 94/18 94/19 95/17 95/22 125/10 155/14 155/18 156/6 169/20 176/22 182/5 216/18 239/9	
personal [3] 1/3 83/17 151/16	
personally [1] 128/12	
persuaded [1] 238/18	
PGP [5] 119/10 120/9 120/14 172/1 172/7	
PGPs [2] 171/25 172/3	
Ph.D [1] 8/25	
Philippines [1] 155/15	
phone [3] 123/12 123/12 123/13	
phrase [1] 114/11	
physical [1] 242/19	
picked [3] 8/12 225/2 225/21	
picture [5] 71/17 81/18 83/14 172/9 225/23	

P

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page 195 of 254
played... [8]
126/19 128/4 129/1
129/18 156/3
224/14 231/5
231/24
player [1] 70/15
playing [1] 243/21
pleading [1]
150/25
pleasant [6] 107/5
107/8 107/11
109/23 236/7 246/2
please [225] 3/16
6/3 6/12 8/6 9/19
10/1 12/15 12/16
13/22 16/6 16/7
16/12 18/4 19/18
21/12 22/9 25/11
25/14 27/10 28/24
31/2 32/6 35/5
35/22 36/9 36/17
38/11 39/8 39/19
40/13 40/15 41/15
42/23 44/9 46/2
46/6 46/7 46/9
46/13 48/9 49/6
50/8 51/3 52/11
52/13 52/17 53/2
53/2 54/7 54/12
57/14 58/12 58/14
59/2 60/22 62/11
62/12 62/15 62/17
63/7 63/18 64/6
64/17 65/8 66/8
66/20 66/21 67/21
70/6 70/7 72/5
74/11 76/19 77/9
79/23 80/15 80/19
81/13 82/22 83/6
84/5 85/14 85/23
89/16 89/24 90/1
91/5 91/8 96/23

96/25 97/2 97/3

97/4 98/8 98/3
100/21 101/18
102/19 103/2 103/7
104/6 104/11 105/1
105/9 105/12 106/3
107/11 109/22
109/25 112/15
114/20 114/22
114/24 115/8
116/12 116/17
119/12 123/17
125/3 125/15
126/17 128/2
128/24 129/16
130/2 130/8 131/22
132/17 132/22
134/20 136/18
136/21 137/4
137/12 137/23
138/18 138/20
138/25 139/3
142/12 142/13
144/7 144/15
144/16 144/17
146/5 146/23
148/16 148/18
149/6 150/6 150/13
150/14 151/6
152/20 153/24
156/1 157/15
157/17 160/16
160/23 161/14
168/16 168/18
172/24 172/25
174/20 179/6 179/9
180/22 182/15
184/2 185/9 186/6
187/2 192/5 192/14
192/15 195/11
195/11 196/2
198/22 199/2 202/4
202/23 204/18
204/25 205/15

205/16 206/17

206/23 207/2
208/17 208/24
209/4 209/9 209/12
209/17 209/20
209/20 209/22
210/21 211/3
211/13 213/3
213/11 215/1
217/21 221/17
222/6 223/2 223/25
224/12 224/17
225/6 225/10 231/3
231/22 233/3 234/5
235/12 235/25
236/4 236/21 245/6
plus [3] 171/15
209/13 219/25
podcast [7] 71/4
71/4 71/16 71/19
71/22 73/6 74/12
point [39] 7/4
11/14 12/11 14/18
20/20 31/12 33/3
41/5 50/1 50/18
50/23 60/3 63/12
67/20 71/23 85/17
90/16 96/6 102/16
123/10 164/14
166/24 167/6 177/9
179/4 208/15 212/5
233/13 237/12
238/21 239/2 239/7
239/15 240/16
240/21 241/7
241/16 242/1
244/15
pointed [1] 184/12
pointing [1] 59/10
points [2] 230/21
241/2
poker [1] 219/17
police [5] 96/21
97/6 114/15 114/22

P	pre [1] 102/25 pre incorporation [1] 102/25 precise [2] 56/9 140/9 predicate [8] 117/11 121/14 127/1 193/3 204/7 231/11 232/6 237/24 preedited [1] 82/5 prejudice [2] 228/14 240/18 prejudices [1] 244/1 prejudicial [7] 41/10 228/25 229/11 237/18 238/11 239/11 245/1 premature [1] 238/12 premise [1] 155/21 prepare [1] 235/17 present [8] 60/13 107/7 109/10 162/12 236/9 242/6 245/7 247/7 presentation [1] 244/11 presented [5] 107/18 107/19 107/24 240/9 241/19 presenting [1] 145/10 preservation [1] 134/17 preserve [3] 13/15 126/22 242/25 preserving [1] 134/14 press [1] 231/8 pretty [2] 65/17	218/23 previous [3] 56/22 143/2 147/6 previously [4] 6/9 96/20 105/21 131/18 price [1] 212/20 print [2] 194/18 194/19 printout [1] 168/23 prior [1] 73/9 private [27] 47/11 51/17 53/11 111/4 111/8 114/14 116/10 118/7 118/14 118/18 119/10 137/15 137/18 163/23 163/24 163/25 164/5 172/11 172/18 172/20 172/21 173/20 173/22 177/2 177/2 177/4 177/5 privilege [1] 174/22 privileged [2] 14/23 14/25 probably [4] 5/17 141/16 161/24 232/16 probative [1] 241/15 problem [1] 91/15 procedure [2] 239/13 239/21 procedures [2] 240/25 242/13 proceed [2] 3/7 238/20 proceeding [3] 13/15 31/21 190/20 proceedings [18]
USCA11 Case: 22-11150	Document 58-0 Date Filed 11/30/2022 Page 396 of 564	22
police... [1] 115/17		
Ponce [1] 1/21		
pool [3] 94/4 94/10 95/11		
pooled [1] 94/2		
poor [1] 136/8		
portion [4] 49/2 72/6 195/4 224/1		
position [2] 5/1 227/20		
positions [1] 5/21		
possession [5] 116/10 117/10 118/17 118/19 118/23		
possible [2] 161/7 172/17		
possibly [1] 114/4		
post [26] 63/24 64/3 80/8 80/10 80/11 81/2 81/24 82/21 83/7 83/10 83/11 83/13 83/15 84/17 84/18 84/21 85/17 85/19 86/5 86/8 86/20 86/22 87/4 87/18 87/21 87/25		
posted [3] 65/10 80/14 93/2		
posting [1] 92/24		
posts [5] 65/17 88/5 93/3 93/4 93/13		
pot [6] 142/19 142/20 143/6 143/15 143/18 143/19		
power [1] 202/9		
PR [3] 231/7 231/15 232/24		

P	programmer [1] 124/13 project [5] 12/4 48/21 84/18 224/4 224/22 projects [1] 77/21 promise [10] 42/7 51/18 51/18 51/20 51/24 51/25 51/25 52/2 52/3 52/4 promised [1] 52/10 promotion [1] 29/24 proof [1] 141/21 proper [7] 126/11 163/7 166/19 227/4 227/5 229/1 239/14 properly [7] 105/18 105/23 106/1 128/10 165/25 239/15 240/9 property [13] 14/6 15/7 15/16 15/20 47/16 96/10 110/14 237/11 237/25 238/1 238/16 241/10 242/8 proposed [2] 90/5 240/1 prospect [1] 97/7 prospective [1] 221/7 protect [4] 226/8 226/13 226/15 226/17 protecting [2] 226/16 226/17 protocols [1] 123/22 provably [1] 171/25 prove [6] 9/14 141/19 141/21	178/25 206/11 205/15 provide [6] 149/20 227/12 236/14 239/13 243/15 243/23 provided [5] 33/6 149/11 149/19 149/25 152/7 proving [2] 8/16 8/23 provisions [1] 202/10 pseudonym [2] 56/10 75/20 PTY [2] 36/4 159/15 public [34] 45/14 47/8 47/12 56/13 56/14 57/8 57/9 92/1 95/15 95/18 116/20 118/3 118/5 118/17 121/18 124/2 141/4 153/20 153/23 154/3 154/5 154/11 154/13 163/23 164/5 164/6 170/11 172/18 176/24 237/9 238/2 238/7 238/9 244/24 Publication [1] 54/25 publicity [1] 235/8 publicly [3] 95/12 170/12 171/24 publish [38] 13/21 22/9 25/10 28/23 35/22 41/15 46/6 46/13 51/3 54/11 64/16 66/20 77/9 81/12 83/23 83/23 86/18 97/2 99/3 101/18 104/2
USCA11 Case: 22-11150 Proceedings... [18]	Document 5330 Date Filed: 11/30/2022	Page: 197 of 254
process [6] 47/10 169/24 202/5 202/8 210/6 216/11		
produce [5] 123/9 148/2 148/5 148/12 148/23		
produced [27] 27/3 31/25 31/25 32/17 34/16 40/8 57/6 117/5 117/9 118/24 149/3 152/8 153/5 154/17 163/19 164/1 164/8 164/10 165/3 165/8 165/16 165/20 166/7 166/24 175/24 180/14 192/17		
producing [1] 164/17		
product [1] 170/12		
production [6] 119/5 149/22 165/6 166/18 166/21 166/25		
productions [1] 164/1		
Professor [1] 132/5		
profile [1] 64/1		
program [5] 20/23 124/12 124/15 170/7 170/8		
programmed [1] 124/10		

P

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 198 of 254

publish... [17]
 114/24 131/20
 138/20 144/10
 146/23 151/6 151/9
 160/23 179/8 179/9
 182/15 185/9 187/1
 195/11 205/9 222/6
 225/10

published [7]
 47/12 54/21 54/25
 56/17 96/25 136/20
 188/11

pull [1] 191/9

pulled [2] 86/3
 162/17

pump [1] 229/16

punitive [16]
 236/24 236/25
 237/4 237/13
 237/16 238/4
 238/22 239/6 240/1
 240/6 240/7 240/10
 242/1 243/14
 244/11 245/2

punitives [2]
 238/22 241/9

purchase [5]
 100/10 216/4 217/6
 217/9 217/19

purchased [11]
 10/19 10/22 10/23
 11/9 200/20 201/2
 216/7 216/25
 219/10 220/14
 220/15

purchasing [1]
 219/10

pure [1] 124/23

purport [2] 163/20
 180/14

purported [1]
 171/6

purportedly [1]

170/3

purporting [4]
 172/8 191/13 200/7
 225/25

purports [14]
 169/10 172/6 184/4
 185/11 185/14
 185/17 189/5
 189/15 192/21
 194/23 195/1
 195/14 195/18
 213/9

purpose [3] 18/18
 161/10 229/1

purposefully [2]
 126/23 127/23

purposely [3]
 126/21 204/11
 226/19

purposes [10] 74/5
 74/7 75/8 228/14
 229/3 240/23 241/8
 241/13 241/17
 244/17

put [72] 8/20 9/19
 19/13 21/12 24/16
 29/21 32/7 35/5
 38/11 44/5 46/12
 51/21 51/23 52/17
 63/18 66/2 67/24
 68/4 69/9 69/10
 69/14 71/11 79/8
 80/15 80/18 87/8
 87/14 91/20 102/24
 104/25 105/12
 110/4 113/12
 113/13 113/16
 113/18 125/11
 127/8 127/12
 132/14 132/17
 140/24 143/13
 144/16 149/6 153/2
 157/21 165/2 172/1

173/13 174/6 174/8
 174/19 179/1 182/4
 185/21 186/6 187/9
 190/5 191/4 192/2
 197/5 198/21
 202/20 204/18
 216/14 217/4
 217/19 219/18
 220/16 220/22
 226/3

puts [1] 59/19

putting [3] 34/22
 145/23 200/4

Q

quarters [1] 84/24

question [46]
 10/13 14/10 20/3
 26/16 28/7 55/3
 55/7 56/7 56/9
 59/19 62/17 74/9
 75/25 82/23 84/17
 84/20 84/24 85/4
 85/9 85/12 90/1
 90/5 91/23 96/15
 104/13 117/15
 126/11 127/13
 133/25 134/19
 141/5 142/2 142/3
 142/5 148/9 157/25
 158/4 163/19
 165/15 194/11
 202/17 202/22
 202/24 222/14
 229/12 233/17

questioning [3]
 60/23 109/24
 168/17

questions [15]
 63/5 84/15 108/21
 108/22 110/13
 110/23 117/22
 127/3 147/20
 157/23 164/21

Q

USCA11 Case: 22-11150 Document 5910 [3] Filed 11/30/2022 Page 169 of 254
questions... [4]
 206/12 217/4 230/8
 245/11
quibbling [1]
 202/15
quick [1] 50/2
quickly [3] 4/18
 122/2 232/3
quite [6] 98/4
 100/24 141/3 141/6
 156/12 238/23

R

radical [6] 80/13
 82/15 83/9 85/2
 86/23 87/20
raise [1] 238/3
raised [2] 241/1
 244/19
Ramona [5] 21/19
 102/11 102/14
 113/16 216/17
ran [8] 12/6 12/7
 48/22 155/18
 156/15 161/19
 181/18 191/3
ranch [1] 84/19
randomized [1]
 114/8
rant [1] 102/15
rated [1] 102/16
rate [1] 212/24
rather [7] 51/17
 75/17 84/9 98/9
 112/9 121/10
 201/20
Re [1] 169/15
read [17] 5/21
 25/17 26/11 39/7
 43/22 43/25 48/23
 49/2 52/14 62/18
 74/10 89/7 90/2
 90/4 106/7 115/12

139/21

reading 52/5
 74/9 126/10
reads [1] 214/15
ready [5] 3/6 3/9
 3/11 109/23 236/5
real [5] 45/13
 71/1 71/15 209/15
 221/5
reality [2] 93/23
 164/20
realize [2] 92/25
 93/4
realized [1] 165/9
really [16] 58/25
 70/14 74/21 112/10
 116/8 122/20
 158/14 204/16
 231/14 232/10
 232/14 232/15
 233/2 238/18
 241/20 243/20
realm [1] 243/12
reason [11] 59/10
 92/5 125/7 127/10
 127/18 129/9
 129/20 129/23
 159/18 214/18
 220/18
reasons [10] 32/12
 33/23 34/3 34/23
 35/19 35/24 36/3
 38/15 40/17 41/18
rebates [2] 33/15
 33/24
rebuild [1] 121/22
rebuilt [3] 93/13
 121/18 121/24
recall [45] 7/8
 7/18 10/5 20/18
 25/20 49/21 49/25
 66/6 71/2 71/5
 71/6 71/9 71/19
 71/22 74/20 74/23

74/25 75/3 84/17
 84/18 88/16 88/19
 89/6 110/9 110/10
 110/14 110/15
 110/15 111/3 111/7
 111/8 111/14
 111/18 112/3 112/7
 112/12 116/3 116/5
 134/23 138/5 170/8
 170/9 232/22 235/8
 235/16

receipt [3] 213/7
 213/18 213/24

received [52]
 12/23 13/20 15/4
 22/8 25/9 31/19
 33/10 35/21 41/14
 43/9 51/2 59/6
 65/1 66/19 77/6
 81/11 86/17 99/2
 101/17 104/1 113/3
 118/25 119/23
 131/18 133/13
 141/18 146/22
 149/13 150/7 151/3
 151/14 153/17
 160/22 170/3 170/4
 170/7 182/12 185/8
 186/24 187/24
 188/6 189/12
 189/16 191/25
 196/8 205/8 206/2
 206/13 212/11
 222/5 223/18
 236/17
recess [9] 60/12
 60/14 60/16 107/5
 107/9 107/15
 162/11 162/13
 162/25
recipient [5]
 127/8 127/9 127/10
 127/11 214/18
recognize [43] 9/5

R

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page: 200 of 254
recognize... [42]
32/12 33/1 34/13
35/8 40/17 43/11
50/14 50/16 66/11
71/17 76/24 86/5
86/6 98/13 101/2
101/5 112/19
118/15 118/16
119/14 130/22
132/20 146/12
149/9 150/17
168/22 174/17
177/12 180/25
182/20 191/13
204/21 204/23
210/20 211/1 211/7
212/4 221/20 234/3
234/8 234/14 241/4
recollection [11]
17/9 17/12 71/14
88/22 89/3 89/9
148/19 153/4
233/25 234/19
235/1
Recommendation [1]
109/4
reconsideration [1]
164/23
record [34] 14/8
16/14 37/16 37/18
37/22 92/1 107/17
120/24 121/18
122/11 123/9
123/11 123/14
123/24 126/22
128/18 128/22
128/23 129/3
131/11 131/13
131/16 134/17
163/2 164/23 168/6
178/17 194/10
217/24 226/10

232/7 237/8 240/22
240/24
record's [1]
170/21
recorded [7] 45/4
72/2 95/23 95/24
131/11 216/21
216/22
recording [1] 16/6
records [10] 95/12
95/16 95/19 97/16
123/12 124/5
126/23 127/23
131/14 200/21
recycled [1]
102/15
red [1] 87/8
redone [1] 56/21
redundancy [1]
69/1
Reese [2] 224/3
224/21
reference [7] 10/6
16/4 35/14 59/15
64/11 209/1 233/15
referenced [4]
16/15 35/15 183/18
186/2
references [2]
18/14 41/2
referencing [1]
210/14
referred [2] 96/9
96/12
referring [1]
188/2
reflect [2] 125/1
165/15
refresh [7] 88/21
89/3 89/9 153/4
233/25 234/18
235/1
refreshes [2]
71/14 148/19

refunds [2] 33/15
33/24
regard [14] 75/13
108/13 108/20
117/4 174/23
236/13 239/23
240/10 240/20
243/14 244/3 244/5
244/9 244/11
regarding [2]
35/19 239/18
regards [4] 171/17
209/5 209/21 210/6
registered [2]
45/3 170/16
registration [1]
170/14
regulatory [2]
106/9 110/7
Reinhart [2] 109/2
243/8
rejected [2] 34/9
109/3
rejecting [1] 35/2
relate [1] 122/22
related [5] 41/9
122/8 122/19 123/1
244/11
relates [3] 13/15
34/4 220/6
relationship [1]
117/8
release [2] 55/19
56/10
released [2] 57/17
170/21
relevance [9]
13/17 31/14 33/7
39/25 41/7 229/11
229/25 237/5
240/16
relevant [4] 72/6
195/4 237/14
238/24

R

USCA11 Case: 22-11150 Document 34725 Filed 11/30/22 Page 201 of 254

relied [2] 34725
38/15
reluctant [1]
166/4
rely [1] 38/6
relying [1] 32/24
remainder [1]
91/12
remainders [1]
219/25
remaining [1]
91/14
remember [23] 6/17
6/19 7/4 24/2
24/11 42/16 56/1
56/5 63/2 68/19
71/18 73/5 84/12
84/14 85/10 89/11
100/16 148/14
155/17 157/20
157/22 179/20
235/25
remembered [3]
78/22 79/3 79/10
remind [1] 6/9
remittance [1]
136/8
remote [1] 240/17
remove [1] 88/3
removed [1] 92/7
reorient [3] 7/5
20/19 188/20
repeat [4] 62/11
83/3 83/6 84/5
rephrase [5] 48/3
75/23 134/20
141/25 200/13
replicated [1]
93/3
report [2] 109/4
141/17
reported [3] 73/15

141/10 247/8
reporter [1] 1/23
5/2 5/9 5/12 74/8
74/19 247/5
reports [1] 135/22
represent [4]
165/19 173/14
176/22 239/20
representation [6]
74/5 164/13 164/15
165/8 166/6 166/9
representations [1]
166/4
representative [2]
1/3 151/16
represented [3]
164/10 165/22
166/15
request [7] 25/23
26/1 165/16 166/17
166/25 175/23
175/25
requesting [2]
206/3 206/13
requests [1]
166/21
require [6] 94/20
172/13 227/6 227/8
227/19 241/6
required [3] 27/4
27/7 215/10
requires [1] 58/5
requisite [2] 33/6
237/24
research [11] 1/4
30/5 30/6 36/14
108/5 135/9 136/1
151/19 236/3 240/4
240/8
reservations [1]
69/3
reserve [2] 208/18
219/13
reserved [2]
208/24 212/20
residual [4] 5/16
108/12 108/15
109/7
respect [19] 5/2
5/10 5/14 31/15
35/18 40/1 152/24
163/13 166/3 166/7
237/18 238/7 239/5
239/17 239/18
242/10 242/12
242/22 244/19
respond [17] 26/7
29/20 39/7 39/16
60/7 65/21 65/22
78/14 113/10
140/11 147/13
147/19 207/5 207/8
208/17 209/11
209/24
responded [2]
149/13 208/2
responding [1]
133/25
responds [3] 26/1
208/23 209/19
response [9] 10/13
78/12 80/3 145/1
147/13 149/11
153/5 166/17
177/18
rest [1] 153/9
restate [4] 62/17
90/1 91/2 91/3
restricted [1]
137/18
result [1] 241/14
return [3] 47/9
134/5 171/9
returned [1]
189/21
returning [1]
190/1
returns [1] 47/9

R

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 10/30/2022 Page: 20 of 254
reverted [1] 23/11
review [10] 16/8
71/13 75/10 89/2
107/15 148/18
228/9 228/16 229/5
245/13
revolutionize [2]
67/14 68/4
Rica [1] 219/16
Rick [1] 93/11
rid [6] 92/16
128/8 128/9 129/12
129/13 129/21
right [144] 4/3
5/20 5/25 6/2 7/16
8/4 8/16 8/19 9/10
9/14 10/14 11/13
11/16 12/4 13/3
13/5 13/9 13/21
15/25 17/13 18/12
18/15 20/5 20/14
21/22 21/24 22/1
22/14 24/5 26/8
29/4 29/10 31/9
34/10 36/22 38/16
39/10 40/21 44/22
45/19 48/2 48/8
52/11 54/10 57/3
59/16 59/17 60/11
60/17 60/22 61/5
74/4 78/16 80/9
81/10 81/16 81/21
82/12 83/1 83/16
83/22 86/24 87/7
87/14 88/12 89/15
91/14 98/1 101/8
102/5 107/14
109/21 111/12
112/14 115/13
121/12 132/9 133/3
133/23 136/9 140/3
140/8 143/3 143/19

145/4 146/9 152/22
156/24 158/8 161/9
162/10 162/13
163/1 165/14 167/8
168/2 168/12
168/15 169/5 170/2
171/3 173/5 173/16
179/16 183/25
184/9 184/18 188/2
188/5 188/10
188/18 189/3
189/25 193/25
197/5 198/21
198/24 200/8
206/11 207/13
207/16 208/10
210/10 212/5
212/22 215/1 215/4
215/21 217/2 218/1
226/16 227/11
227/15 228/12
229/3 232/22
233/20 234/22
235/3 243/1 243/18
244/16 245/9
245/20
right-hand [4]
86/24 87/7 145/4
170/2
rights [3] 160/10
221/13 237/20
risky [3] 185/18
187/15 188/25
RIVERO [8] 1/19
1/19 4/6 122/17
122/21 152/16
152/22 167/11
RMR [1] 247/17
Road [6] 8/8 92/5
93/5 93/10 170/20
189/17
Robert [19] 58/16
59/9 59/19 60/2
61/25 113/5 113/11

132/21 133/18
174/7 230/10
230/22 230/25
231/2 231/7 231/14
232/2 232/10
232/10
ROCHE [3] 1/12
1/13 3/22
Roger [2] 221/21
222/9
role [2] 78/21
79/1
Room [1] 1/24
rough [1] 167/14
round [2] 56/22
135/14
row [1] 154/4
rows [1] 153/23
royal [3] 99/14
99/21 100/18
RPR [1] 247/17
RSA [1] 172/13
rub [1] 232/10
Rubik [1] 222/9
rule [9] 5/16
108/12 108/13
108/14 108/15
108/16 109/11
229/3 243/22
rules [3] 74/2
227/6 227/8
ruling [2] 109/1
164/23
run [19] 23/24
24/24 25/21 26/21
58/8 59/21 62/2
62/5 63/10 80/6
80/23 82/11 94/5
155/23 158/20
158/22 161/25
174/22 216/10
running [10] 7/25
24/10 45/22 46/24
47/6 58/9 58/10

R

[USCA11 Case: 22-11150](#) Document [53-10](#) Date Filed: [11/30/2022](#) Page [23 of 254](#)
running... [3]
 58/18 60/3 155/16
runs [2] 158/15
 158/21
Russel [1] 93/11
Russian [3] 200/20
 217/7 219/11
Rwanda [3] 229/9
 229/21 239/19

S

S. [1] 113/11
said [101] 5/3
 10/11 10/15 10/19
 11/21 12/5 17/12
 17/23 20/18 24/10
 25/21 25/22 26/17
 27/20 34/9 34/17
 42/18 43/20 44/4
 45/21 47/20 48/4
 52/4 57/18 61/1
 61/3 62/3 65/14
 66/3 69/2 69/4
 74/16 79/8 79/25
 80/11 82/18 82/20
 83/7 83/9 83/11
 83/11 83/15 89/5
 89/10 90/16 91/22
 91/23 93/10 93/11
 93/12 95/15 96/16
 97/7 99/18 99/24
 106/12 106/14
 110/6 110/10
 110/11 111/10
 112/4 112/9 112/13
 123/15 127/8 138/8
 141/12 142/9
 143/19 144/3
 147/11 158/7 159/7
 161/24 164/15
 164/16 164/16
 166/14 167/16
 167/21 167/22

167/25 170/9
 178/22 178/24
 179/21 184/16
 184/23 189/8 189/9
 192/9 194/15
 198/20 202/6 202/8
 202/19 216/9 224/8
 229/18 232/9
salvage [1] 109/11
same [37] 19/4
 20/17 26/19 31/15
 35/18 37/17 38/8
 38/17 38/17 44/4
 48/17 74/8 74/23
 86/7 102/15 127/6
 129/8 142/9 144/2
 147/14 147/15
 155/4 160/8 168/8
 174/7 174/9 184/24
 187/7 203/15 207/5
 207/15 207/17
 208/2 210/24
 218/11 241/22
 244/19
sanctions [1]
 109/3
Sarah [2] 4/12
 167/13
sat [1] 143/19
satisfies [1] 5/15
satisfy [2] 149/19
 149/25
satoshi [78] 45/6
 45/11 45/16 47/18
 53/22 55/8 55/18
 56/8 56/10 57/17
 68/6 68/9 68/17
 69/19 69/21 70/3
 70/16 70/20 71/1
 71/16 71/20 72/18
 73/3 75/1 75/4
 75/17 75/20 75/22
 75/24 76/1 76/2
 76/4 76/5 76/7

76/8 76/11 76/12
 78/3 85/4 88/9
 88/10 89/4 90/19
 92/8 92/22 92/24
 93/3 93/15 94/14
 95/21 120/20
 123/22 125/4
 126/24 127/24
 128/18 128/22
 129/4 129/11
 133/23 134/6 138/6
 145/18 160/13
 161/7 161/16
 161/19 161/19
 187/24 188/2
 189/11 219/4
 219/24 230/22
 230/25 231/9
 232/24 234/12
Satoshi's [2]
 92/20 136/20
saved [1] 190/23
saves [1] 124/3
saw [7] 16/15
 38/15 134/22
 141/21 178/6 180/2
 201/10
say [115] 11/1
 12/3 17/19 18/10
 18/10 18/12 18/13
 18/20 19/2 20/16
 23/2 23/10 23/15
 23/17 26/7 26/11
 26/13 28/1 30/5
 30/7 34/20 35/15
 38/8 48/21 51/8
 51/16 52/9 52/11
 52/16 53/10 54/17
 57/21 58/11 59/24
 67/12 68/20 70/12
 75/2 75/5 75/21
 75/21 78/16 78/20
 79/2 93/7 93/9
 93/25 97/18 97/25

S

say... [66] 99/8
 99/15 99/16 99/17
 99/17 99/20 99/23
 101/5 101/24
 105/19 108/18
 113/20 114/7 115/2
 115/20 120/13
 121/16 122/1
 122/24 123/4
 133/18 133/25
 136/6 139/5 139/14
 140/2 140/15 143/9
 143/18 145/2 145/6
 145/8 147/15
 147/21 156/16
 158/12 158/16
 158/16 159/5
 164/16 166/5 169/8
 169/19 169/21
 179/4 185/17 189/7
 189/8 189/15 191/2
 198/2 207/5 208/17
 213/3 214/10
 214/15 214/16
 216/23 219/21
 219/23 226/1
 232/14 232/15
 235/18 240/13
 245/4
saying [30] 8/3
 9/22 15/4 42/20
 45/23 47/15 53/10
 73/2 74/15 74/16
 78/23 78/24 106/20
 106/20 132/5
 160/15 165/24
 166/6 167/21 182/3
 187/14 200/3 201/2
 202/12 207/19
 215/18 217/12
 218/17 220/19
 228/19

says [92] 10/15

13/3 16/3 17/3
 17/22 17/25 18/1
 18/5 26/13 26/20
 27/8 27/11 29/16
 30/3 30/6 31/6
 39/9 39/14 49/14
 52/7 57/24 59/20
 60/3 61/20 78/6
 82/13 87/19 97/23
 102/14 103/16
 104/4 104/5 106/8
 116/15 116/19
 118/7 118/14
 133/22 140/6 140/8
 140/8 144/18 145/5
 147/5 152/15 154/2
 154/6 156/23
 168/25 169/1 169/5
 169/15 169/22
 170/3 173/2 173/7
 173/20 173/22
 177/1 179/15
 181/22 181/24
 181/24 182/1 182/3
 184/7 184/17
 187/17 187/19
 188/4 188/5 189/10
 189/20 194/24
 194/25 196/10
 197/12 197/18
 198/3 198/6 199/5
 199/23 203/2 208/3
 208/23 214/6 214/7
 214/9 214/14
 214/17 225/15
 233/11
scale [1] 8/16
scam [1] 229/16
scan [1] 199/8
schedule [2] 3/3
 212/22
scheduled [4] 6/6
 210/4 210/5 235/9

schedules [1]

202/23 202/23
SCHILLER [1] 1/15
scope [1] 41/10
screen [9] 9/20
 104/25 112/16
 148/18 150/18
 188/12 188/17
 191/5 192/5
screw [1] 221/2
screwed [1] 9/1
script [2] 228/11
 230/24
scripted [4]
 169/16 169/16
 169/16 231/18
scripting [1]
 124/13
scroll [9] 36/9
 42/23 78/11 132/22
 139/19 207/2
 207/23 208/21
 209/8
seal [1] 242/13
sealed [1] 175/20
search [2] 50/2
 166/23
searches [1]
 166/22
seat [2] 163/1
 236/21
seated [5] 6/3
 60/23 107/11
 109/22 168/16
Sebastian [1]
 83/22
second [26] 11/7
 32/7 42/1 48/20
 49/14 62/11 62/15
 72/13 84/5 89/24
 91/5 105/1 117/17
 119/19 125/17
 126/2 127/13
 130/14 133/18

S

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 25 of 254
second... [7]
137/6 157/15
157/17 174/11
179/16 194/7 208/4
seconds [1] 72/7
secret [15] 12/6
45/1 47/17 48/2
48/6 49/4 50/5
53/6 53/9 53/20
136/15 136/15
136/16 136/17
181/17
secrets [1] 49/19
section [1] 230/14
secure [1] 171/10
securer [1] 79/16
security [2]
141/10 172/1
see [347]
seeing [4] 11/21
17/19 111/18
204/15
seek [2] 25/19
73/8
seeking [9] 4/22
33/16 145/18
226/23 234/20
234/21 237/1
243/13 243/25
seem [2] 40/9
219/2
seems [5] 17/19
145/19 158/13
165/1 170/18
seen [21] 44/13
44/15 48/11 98/19
113/12 120/19
121/5 125/7 138/9
178/13 201/15
207/13 212/19
217/15 217/17
227/17 228/19

239/17 241/9
242/10 243/21
seize [1] 226/21
seized [1] 121/23
selected [1] 171/3
sell [4] 9/2 9/8
232/3 232/19
selling [1] 47/15
seminal [1] 132/14
send [22] 15/10
51/16 51/17 83/19
111/4 124/4 124/16
124/21 136/11
163/23 165/12
172/10 172/17
172/19 172/20
172/22 174/4 174/5
175/24 176/14
176/15 211/16
sending [2] 15/6
77/13
sent [28] 15/10
15/12 19/16 20/13
22/20 32/5 45/15
45/16 49/25 50/4
56/18 56/22 88/16
123/23 149/18
169/11 171/22
171/23 171/25
175/23 176/1 200/3
213/21 214/9
214/10 214/14
214/15 214/16
sentence [11] 10/1
18/16 42/1 42/8
61/11 87/21 99/19
114/1 136/23 161/4
187/21
separate [4] 91/25
94/6 216/11 242/5
separately [1]
93/21
September [1]
222/9

series [3] 7/22
95/12 110/13
seriously [1]
150/12
server [3] 92/8
92/12 171/25
servers [6] 121/19
121/23 121/23
135/16 141/11
141/13
service [1] 116/7
services [2]
211/20 211/22
set [31] 19/22
20/6 23/4 29/21
30/4 30/11 92/3
92/22 94/7 107/17
135/12 144/18
145/2 156/24
156/25 157/1
158/10 159/19
159/20 160/10
161/8 171/24
178/10 181/7 181/8
181/12 181/18
199/22 202/12
243/4 247/14
sets [1] 157/5
settings [3]
116/15 173/8
173/18
settled [2] 199/5
203/2
Seven [1] 49/10
several [4] 44/24
55/10 78/15 93/13
sewing [1] 58/3
Seychelles [12]
23/11 143/9 143/19
143/24 144/2
144/19 145/2
145/11 213/21
214/1 215/20 216/4
Shadders [1] 94/2

S

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 206 of 254
Shan [1] 4/13
shall [2] 187/23
189/10
sham [1] 191/2
shame [1] 27/15
share [2] 211/11
226/7
shared [6] 49/19
94/10 111/21
111/21 137/18
216/20
shareholder [3]
156/8 211/20
211/22
shareholders [3]
45/4 156/11 210/25
shares [5] 156/11
156/20 158/2 158/4
181/21
sharing [1] 122/22
she [18] 7/2 7/4
17/8 20/22 20/25
21/2 21/20 42/18
42/20 68/24 102/16
102/17 112/9 122/8
158/20 182/5
227/23 245/6
she's [1] 21/21
shed [2] 48/4
243/24
shelf [8] 204/12
205/24 206/3
206/13 206/17
207/9 209/15 216/4
shit [2] 70/2 93/5
Shoeb [1] 56/4
shorthand [2]
247/5 247/8
shortly [3] 171/12
244/21 245/19
should [15] 4/23
5/19 32/8 69/13

69/13 79/10 79/11
105/23 115/8
161/24 165/25
171/12 232/16
243/11 244/10
shouting [3] 53/5
53/6 53/14
show [19] 5/18
7/23 28/4 52/19
58/13 68/6 68/11
73/5 74/12 82/6
88/23 110/13
110/20 136/19
166/6 200/8 228/10
236/14 242/20
Showed [3] 9/17
83/14 201/19
Showing [5] 68/10
110/12 200/15
201/18 234/16
shown [2] 32/8
140/24
shows [3] 117/6
117/13 241/9
shut [1] 92/15
side [32] 81/18
86/19 86/22 86/24
87/7 87/11 87/13
105/15 106/8 115/8
115/10 115/10
115/13 134/4
144/16 144/16
144/25 145/4
153/22 153/24
168/25 169/1 169/5
182/21 185/22
186/7 191/5 192/5
196/2 198/10 215/4
217/20
sides [1] 3/6
sig [1] 94/16
sign [6] 94/21
94/21 95/1 100/5
119/10 216/18

sign-off [1] 100/5
signatories [1]
215/11
signature [12]
103/12 104/9
104/14 104/21
104/22 105/10
120/9 172/15 183/4
183/6 205/18 209/4
signatures [1]
94/23
signed [11] 120/8
152/22 172/2 172/4
172/15 183/8
208/25 216/10
216/15 219/3 220/5
significant [1]
5/8
signify [1] 87/8
signing [4] 173/22
177/2 177/5 181/14
Silk [5] 8/8 92/5
93/5 93/10 170/20
silly [1] 204/16
similar [1] 106/15
simple [13] 20/25
95/5 100/6 124/13
124/14 127/11
141/17 157/8
158/14 158/18
219/20 219/23
220/18
simpler [1] 171/9
simplified [1]
161/18
simply [9] 5/6
91/12 96/1 104/17
141/15 200/25
218/15 237/19
244/16
since [13] 4/24
45/22 46/25 49/18
57/22 61/5 61/12
107/16 109/3

S

USCA11 Case: 22-11150 Document 10 Filed 11/30/22 Page 202 of 254
since... [4]
147/11 178/10
207/9 220/20
single [7] 57/6
95/21 132/10 237/9
237/10 238/1 238/2
sir [9] 17/3 20/3
82/24 163/7 171/8
174/3 174/25 188/8
236/22
sister's [2] 55/25
226/17
sit [3] 143/6
158/21 191/2
site [4] 90/21
92/10 93/13 93/17
sits [2] 158/21
161/22
sitting [1] 229/13
situation [1]
108/20
six [1] 90/23
skills [1] 70/12
Skype [2] 74/22
209/2
Slack [4] 63/22
64/4 65/5 160/25
slave [1] 70/15
slices [4] 20/22
42/20 43/20 152/7
small [3] 100/24
102/24 171/15
smaller [2] 171/8
177/24
SMS [2] 123/11
123/11
so [273]
software [11]
10/17 55/20 56/11
56/17 57/2 97/8
135/16 135/19
168/23 168/23

202/9
software-based [1]
202/9
sole [2] 156/8
200/17
solved [2] 106/10
110/8
some [45] 3/3 4/19
7/8 12/10 20/20
21/3 21/3 21/9
39/22 42/18 49/25
50/1 51/17 56/18
70/13 70/13 77/21
80/12 82/14 83/9
85/1 85/17 86/23
87/20 95/19 96/16
100/5 108/4 112/4
113/20 114/2 116/7
124/14 124/20
127/5 159/7 165/23
170/7 172/3 175/8
177/24 204/1
210/13 225/21
243/11
somebody [5] 14/5
24/20 50/9 173/11
205/14
someday [2] 44/21
238/8
someone [19] 8/19
12/21 16/18 17/12
21/8 74/21 79/12
83/17 94/5 94/7
112/2 118/10
118/15 124/8
129/24 141/13
141/14 175/23
218/20
someone's [1]
206/9
something [16] 9/1
9/6 9/12 21/8
52/14 53/25 78/8
95/14 106/19 118/9

124/16 150/11
182/7 182/17 215/8
221/12
sometime [1] 87/20
sometimes [2]
94/22 100/11
somewhat [2]
237/12 242/5
Sommer [5] 37/3
140/6 140/6 140/8
220/19
son [2] 67/7 67/23
soon [1] 171/16
sorry [72] 8/6
17/24 18/11 19/25
20/18 23/21 28/21
31/24 33/18 36/10
37/8 44/14 48/3
51/22 54/23 55/21
57/24 61/6 61/13
61/15 61/19 68/20
69/11 71/6 71/9
71/18 72/10 75/23
75/25 82/20 83/5
85/7 93/7 93/25
97/25 99/25 103/9
105/25 106/16
115/8 124/24
125/15 125/24
126/4 127/18 129/8
130/14 131/8
132/17 133/8 137/5
138/15 150/6 151/7
153/19 154/20
155/17 162/1 162/3
163/11 167/25
169/9 171/20
184/22 188/12
196/12 200/23
209/12 210/3
210/20 213/2
216/24
sort [4] 5/9 94/9
160/8 178/11

S

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 208 of 254
sought [1] 45/5
sounding [2] 52/24
232/14
sounds [1] 8/22
source [2] 37/2
178/15
sourced [5] 30/24
38/23 39/6 145/6
147/24
SourceForge [1]
56/15
sources [1] 34/22
South [7] 1/14
96/20 97/6 114/21
136/9 136/11
189/17
Southeast [1] 1/17
SOUTHERN [3] 1/1
247/3 247/6
speak [3] 44/6
231/2 236/1
speaker [2] 39/10
39/12
speaking [3] 46/23
66/12 165/17
speaks [4] 18/22
97/20 184/11 203/7
specific [1]
166/25
specifically [4]
62/22 152/6 231/7
240/2
speculation [1]
193/11
spend [6] 8/23
15/12 58/2 58/2
201/5 201/6
spending [1] 69/5
spent [6] 8/8 8/13
8/21 122/17 122/21
200/19
split [1] 202/8

split-key [1]

202/8
spoke [1] 14/17
SQ [1] 23/11
ss [1] 247/2
SSIs [1] 202/9
staff [15] 27/5
34/18 80/6 83/19
83/21 113/21 122/2
122/3 150/8 156/16
156/16 156/18
161/25 175/3 204/1
stage [5] 102/24
158/3 172/1 220/15
221/10
stamp [4] 34/14
151/13 151/13
182/19
stamped [1] 166/16
stand [2] 4/14
165/24
standard [1]
154/15
stands [2] 10/16
90/14
start [22] 23/16
23/18 24/1 24/2
24/9 24/13 26/18
44/14 80/12 82/14
83/9 85/1 86/23
87/20 106/25 139/5
139/11 140/2
140/15 162/4
230/16 245/7
started [11] 3/13
18/16 18/20 24/4
24/10 26/14 27/11
53/13 139/15
155/11 178/12
starting [1] 3/16
starts [5] 84/21
84/25 136/23
187/17 187/19
state [4] 3/16

35/3 108/24 240/24

stated [13] 20/15
32/24 33/6 42/11
42/21 103/22 134/4
166/12 179/14
179/23 180/3
191/21 193/13
statement [21] 5/2
7/15 9/16 14/21
17/17 18/6 73/9
73/17 90/4 96/20
96/25 97/6 108/9
114/15 114/21
122/7 134/18
164/25 166/3
215/12 215/13
statements [15]
5/10 5/13 7/12
34/23 72/1 75/13
96/17 109/12
166/11 194/10
208/13 208/13
237/2 244/23
244/24
states [9] 1/1
1/10 39/15 132/4
182/25 183/12
240/2 247/1 247/6
stating [1] 237/2
stay [1] 137/15
stays [1] 218/16
Stefan [1] 113/18
stenographic [1]
247/11
STEPHEN [3] 1/16
1/17 3/24
steps [5] 53/22
53/24 226/8 226/13
226/15
Steve [4] 3/23
56/3 94/2 94/11
Steven [4] 106/13
182/4 182/4 182/5
Stevens [1] 182/6

S

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 209 of 254
still [14] 35/3
56/24 57/1 57/2
79/18 92/6 128/7
128/11 128/11
158/10 170/11
178/12 208/2 220/8
stipulate [1]
244/5
stipulation [2]
245/10 245/13
stole [1] 113/21
stolen [2] 112/2
112/4
stop [5] 72/15
107/3 220/25 221/1
230/14
stopped [2] 7/6
90/24
story [5] 28/4
68/9 86/25 87/2
221/5
strangely [1]
95/25
Street [1] 1/17
strike [6] 33/21
38/20 96/3 96/6
158/24 194/9
stroke [1] 124/6
strongly [1]
238/13
structure [3]
157/2 160/11
181/18
structured [3]
160/5 160/8 160/10
structures [1]
181/5
stupid [1] 8/22
subject [8] 13/4
59/12 59/20 133/20
169/15 169/19
207/11 210/18

submit [1] 175/6
submitted [7] 1/1
43/12 175/1 181/1
182/18 193/14
207/19 240/3
substance [1]
171/21
substantive [1]
233/16
subsystem [1] 94/6
succeeded [1]
128/16
such [9] 23/20
34/2 75/2 75/5
94/17 109/13 123/5
149/3 181/13
sudden [1] 165/23
sued [2] 28/17
79/6
sufficient [2]
4/22 228/15
suggest [2] 44/19
244/2
suggests [1] 44/21
Suite [3] 1/14
1/17 1/21
Sullivan [7] 4/20
4/25 74/19 74/25
75/3 108/21 109/10
Sullivan's [1]
108/8
sum [2] 115/21
171/21
summarize [1]
201/7
Summary [1] 36/13
Sunday [1] 171/2
sunk [1] 10/12
support [2] 241/20
243/25
supports [1]
127/17
supposed [8] 57/4
110/22 118/17
119/14 121/9
121/10 187/14
199/13
supposedly [1]
113/6
suppress [2] 135/6
136/24
sure [24] 15/1
26/18 39/13 43/5
52/10 53/22 58/4
61/7 64/23 76/21
78/23 86/19 92/19
123/4 123/8 129/3
130/15 131/12
137/10 158/12
164/7 179/8 220/17
226/19
surviving [1] 75/1
suspect [2] 113/20
245/5
sustained [30]
18/24 19/5 53/18
72/24 75/14 97/21
109/13 119/7 128/1
134/19 141/24
152/25 154/25
155/5 162/17 163/5
164/22 167/6 173/3
177/14 193/5
193/23 194/5
194/12 200/12
203/8 207/22 218/1
226/11 230/1
sway [2] 237/21
239/7
swear [6] 93/6
183/22 192/9
194/14 194/21
195/21
swearing [2] 93/8
232/15
SWIFT [3] 209/1
209/21 212/21
switch [1] 210/12

S

swore [16] 186/8
 187/5 187/10
 188/23 188/24
 189/4 192/2 192/18
 194/8 194/16
 195/22 197/8 197/8
 199/4 201/10
 207/15
sworn [8] 26/17
 43/11 43/18 134/22
 180/19 180/25
 185/24 196/19
sympathetic [1]
 237/22
sympathy [3] 239/7
 241/18 243/2
system [10] 9/5
 24/11 24/14 44/3
 91/25 91/25 136/7
 151/14 181/12
 200/6
systems [4] 27/4
 94/8 96/1 135/16

T

table [3] 3/25
 152/18 236/11
tactics [1] 220/24
take [73] 15/7
 15/18 19/8 23/13
 28/16 28/18 30/21
 35/12 39/18 43/3
 44/8 44/14 46/10
 49/22 51/11 53/24
 54/18 59/11 60/10
 60/12 61/23 65/23
 66/3 67/18 70/22
 71/13 76/17 79/22
 85/14 88/6 96/24
 98/1 100/19 102/18
 103/1 107/2 107/5
 107/15 110/17
 110/25 111/11

114/12 115/7
 115/25 120/17
 123/15 132/16
 137/22 138/24
 143/22 145/15
 150/12 150/13
 153/1 156/17 161/8
 161/13 162/5
 162/10 180/11
 181/17 183/25
 186/11 187/15
 192/1 206/20 220/9
 222/21 228/5 230/4
 230/5 235/13
 243/12
taken [5] 5/7
 182/2 190/22
 226/15 229/4
takes [4] 16/15
 132/8 132/10
 132/13
taking [3] 14/12
 158/9 199/11
talk [16] 22/1
 28/2 28/3 68/22
 69/3 69/15 99/14
 99/15 99/16 99/17
 101/11 133/6
 177/16 179/17
 179/19 215/16
talked [12] 12/10
 56/19 57/10 68/24
 68/25 69/1 69/13
 69/14 71/20 74/18
 116/3 221/14
talking [28] 11/3
 11/9 56/20 57/11
 74/22 78/3 90/22
 90/24 91/24 93/5
 100/14 100/14
 106/19 140/3
 140/16 165/18
 167/3 173/11
 181/19 202/20

210/25 217/9
 217/11 220/14
 221/11 221/23
 225/15 244/16
talks [5] 58/18
 58/19 68/9 181/3
 181/4
tantamount [1]
 119/6
tax [61] 11/7
 12/11 12/23 14/12
 15/5 32/1 32/15
 33/15 33/24 34/11
 34/11 34/13 34/15
 35/2 35/3 35/4
 36/14 44/24 47/9
 47/10 47/13 47/14
 47/16 47/18 47/19
 57/21 61/4 61/11
 95/23 97/17 135/20
 135/21 136/3
 138/22 140/21
 140/23 141/10
 141/10 141/11
 141/13 141/14
 141/15 142/8 145/1
 156/25 157/1 157/2
 159/22 160/5
 160/11 178/14
 190/18 190/20
 191/2 204/2 207/17
 217/12 217/12
 220/20 223/8 224/1
tax-effective [1]
 157/1
Taxation [31] 13/1
 15/8 15/18 16/2
 16/19 17/7 28/12
 28/16 29/3 29/15
 30/19 31/5 31/25
 32/13 33/2 33/14
 33/22 34/3 35/9
 35/25 38/22 39/4
 40/18 41/19 45/24

T

USCA11 Case: 22-11150 Document 53-2 Date Filed: 11/30/2022 Page: 21 of 254
taxation... [6]
46/16 98/21 141/7
142/16 144/14
225/15
taxes [1] 47/18
taxpayer [1] 36/14
team [11] 4/13
14/18 69/22 70/3
70/15 70/16 70/17
70/20 73/3 135/23
165/9
tech [2] 4/1 77/21
technically [12]
20/22 21/2 58/9
69/23 93/18 106/22
123/13 148/7
156/15 161/20
174/3 214/3
Technologies [1]
108/6
technology [2]
8/25 68/5
telephone [1]
209/3
tell [14] 11/7
29/16 29/18 44/20
67/23 68/3 68/8
115/17 136/16
144/25 154/19
212/21 241/21
244/9
telling [7] 7/18
47/7 61/4 74/25
75/3 100/2 211/16
tells [2] 212/20
224/1
tens [1] 8/21
tenth [1] 136/10
term [1] 52/10
terms [3] 92/2
180/15 241/15
terrible [2] 69/10

70/15
Tesla [2] 161/23
161/23
test [1] 154/24
tested [2] 8/12
181/19
testified [8]
34/15 82/18 105/16
105/21 106/7 111/7
111/12 177/12
testify [7] 6/24
27/24 120/12 121/8
148/22 164/19
193/25
testifying [1]
238/7
testimony [29] 7/1
7/2 15/2 27/21
43/18 53/17 83/16
92/19 109/9 126/13
134/22 134/25
138/6 140/25 141/6
141/9 141/17 157/9
158/9 158/23
159/12 172/5
178/19 207/21
237/7 237/17 238/4
238/18 241/13
Testnet [8] 7/25
23/16 23/18 23/20
23/21 24/5 24/10
24/13
text [10] 59/2
124/23 140/14
145/10 171/6
173/13 192/15
228/11 228/15
228/18
than [18] 5/18
34/19 58/8 59/21
70/13 132/8 144/23
147/2 184/20
201/20 208/8
208/11 227/21
229/8 229/20
232/12 233/16
239/19
thank [59] 11/24
12/18 13/23 19/9
22/10 22/14 24/15
24/17 29/13 41/16
44/10 46/21 49/23
60/15 61/9 65/2
67/18 68/12 70/23
77/10 88/7 100/25
109/14 111/1
114/12 114/25
115/15 115/25
131/21 137/12
137/22 139/9
139/24 142/13
143/16 144/11
144/22 146/8
162/20 167/7 168/7
180/12 185/3
188/18 220/9
222/21 224/19
224/24 226/3 230/7
233/23 234/22
235/6 236/12
236/17 243/16
244/14 245/15
245/21
thankful [1]
156/13
thanks [3] 21/17
72/15 208/23
that [1217]
that's [135] 7/10
8/2 8/3 8/4 9/20
12/5 12/13 12/14
13/4 14/2 15/19
16/24 20/15 29/20
29/20 31/6 34/1
45/24 50/7 50/18
52/9 57/24 59/15
61/2 61/20 62/3
63/24 69/23 72/9

T

USCA11 Case: 22-11150 Document 53-10 Date Filed: 1/30/2022 Page: 24 of 254
that's... [106]
78/5 82/18 82/20
87/4 87/14 87/22
87/25 88/13 90/4
90/5 91/15 92/25
93/14 95/17 97/8
97/23 100/4 104/5
107/21 108/7
110/10 111/12
111/19 111/23
112/13 113/14
115/21 117/3 122/3
124/8 125/10
127/18 128/13
128/23 131/14
132/14 134/7
134/25 138/4 141/3
141/6 147/18 148/8
150/18 154/5
156/24 157/8
158/18 158/18
160/1 161/18
164/13 165/12
166/11 166/24
167/2 167/18 169/7
169/8 169/11 171/3
173/12 173/18
174/3 176/1 177/6
177/8 177/19
184/19 187/7 189/7
192/3 195/20
195/25 198/6 198/7
201/25 202/14
205/10 205/20
208/9 213/9 214/4
214/7 215/8 215/8
215/11 215/12
215/22 221/5
227/20 227/20
234/2 234/3 235/2
235/18 237/12
238/1 238/10 239/4

239/16 239/21

241/1 241/5 242/3
242/5**That's a [1]**

227/20

theft [1] 114/2**their [18]** 17/12

34/23 34/23 35/1

38/6 40/7 56/2

95/25 112/11

141/11 156/13

159/22 162/16

214/3 215/21

215/22 229/15

240/5

them [52] 17/13

17/14 27/14 39/22

40/10 44/4 50/3

52/13 52/14 57/3

75/19 83/19 92/7

92/9 94/19 100/12

100/13 102/5

102/23 112/5

112/12 123/24

127/12 128/6

129/24 133/7 133/8

135/9 138/13

142/10 144/16

147/3 148/4 148/4

148/4 150/9 150/10

150/10 155/24

158/6 162/3 172/16

178/14 200/4 202/4

207/19 219/10

229/14 229/17

233/2 237/22

242/11

then [96] 7/22

10/8 11/4 11/12

11/18 11/22 12/2

12/10 17/13 18/16

23/10 26/7 26/11

30/3 37/16 37/25

39/13 39/16 42/15

47/16 50/20 55/17

56/15 58/20 60/22

60/7 61/22 67/12

68/8 74/6 74/23

78/6 83/23 87/15

91/22 91/23 93/3

94/7 94/21 95/10

95/11 99/21 100/5

102/6 103/9 104/13

106/21 106/22

107/22 113/20

114/7 135/20

136/16 140/4

140/11 144/21

145/4 160/9 165/9

165/24 170/9 171/9

172/4 172/18

173/10 173/19

174/1 174/17

176/15 176/17

176/17 176/17

176/17 176/19

176/20 188/4

188/10 189/10

189/15 189/20

193/7 200/4 203/25

212/24 216/15

216/16 218/16

219/18 223/22

226/20 228/17

230/8 235/23 240/5

240/14 244/4

theoretical [1]

213/1

there [119] 4/17

4/24 5/11 6/22

7/10 7/18 7/19 8/2

12/6 12/7 21/7

22/14 29/20 29/25

38/19 41/2 44/7

46/20 48/22 50/18

53/24 55/10 56/23

57/11 59/10 73/2

73/4 74/15 74/16

TUSCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page: 203 of 254
there... [90] 88/9

88/11 91/20 92/14
93/1 93/4 94/9
94/24 95/2 95/3
95/10 98/7 98/17
100/10 101/9
102/24 104/4
106/19 109/15
114/1 118/8 122/7
123/5 123/13
123/24 124/1 124/1
124/19 124/20
127/3 127/3 127/16
128/7 128/11
128/21 129/3 133/3
134/1 140/23 141/9
141/12 142/17
143/3 146/6 156/8
156/22 161/22
166/8 169/4 170/2
170/5 170/17
172/12 172/14
172/15 173/12
176/23 178/23
179/3 181/14
184/14 184/23
191/2 200/22 212/3
213/13 213/17
214/3 216/16 218/7
219/24 220/1
223/22 225/16
230/10 231/15
233/17 234/3
237/13 237/25
238/14 238/18
238/21 239/8
239/13 240/13
240/25 240/25
244/3 245/17

there's [46] 5/17
23/20 32/14 74/16
84/25 118/5 118/9

123/13 126/9
127/18 128/15
133/8 134/16
137/20 140/4 142/2
142/3 142/5 164/3
164/22 164/22
165/14 169/20
171/11 172/3
173/19 176/23
177/23 177/24
194/11 202/22
213/17 213/24
215/6 220/2 232/7
237/7 237/9 238/14
239/15 239/21
241/14 241/25
242/2 243/11
244/18

thereabouts [1]

12/14

Therefore [1]

155/22

these [43] 16/8

34/9 38/10 51/7
57/4 79/19 95/23
95/24 95/25 97/16
98/4 108/3 122/18
123/16 124/21
127/8 154/16
158/19 162/2 163/9
164/1 164/10 165/7
165/23 170/3 170/7
173/25 177/5
180/19 181/5 193/1

194/6 194/10

201/23 203/10

208/12 212/19

224/8 224/20

226/19 234/12

235/8 235/16

they [73] 33/15

33/20 33/23 35/15
38/6 38/8 38/15
39/5 39/21 39/23

40/5 40/7 43/20

45/18 47/20 47/20

57/12 59/19 79/18

83/23 92/6 92/7

92/25 93/1 93/12

102/4 102/5 109/5

113/7 114/3 114/8

120/1 121/16 122/3

123/6 127/9 136/14

138/13 140/19

140/25 140/25

141/1 141/8 141/21

145/6 152/19

154/14 156/16

156/18 159/16

162/1 163/20

164/21 165/20

165/24 165/25

166/16 177/3 179/4

179/5 180/21

198/18 198/18

216/14 216/16

219/11 221/1 221/2

221/4 221/10

226/19 239/14

242/11

they're [13]

123/13 127/11

154/14 166/16

172/4 177/25

181/21 194/10

208/13 214/3

215/19 217/11

217/25

Theymos [1] 70/1

thing [37] 11/11

20/17 23/20 69/4

69/7 75/2 75/5

91/12 94/16 95/5

95/13 114/2 114/3

124/9 124/16 129/8

130/1 142/9 157/1

158/10 160/8 168/8

169/7 176/18 181/8

T

thing... [12]	136/22 137/12 141/16 152/6 245/4 thirds [1] 82/12 this [451] those [35] 5/12 13/16 32/25 47/12 50/5 56/13 56/19 88/6 95/1 100/15 106/21 109/4 112/7 118/18 123/12 123/23 127/9 127/9 127/12 138/12 152/18 154/13 155/19 155/23 156/10 165/19 175/7 179/2 220/10 227/19 229/17 229/17 232/12 232/24 242/12	193/18 209/13 210/5 215/11 217/9 225/19 three-quarters [1] 84/24 through [52] 1/8 6/17 7/8 7/22 29/7 44/14 62/9 62/14 70/14 84/4 84/7 84/9 86/3 87/14 88/24 89/23 91/1 91/4 100/5 104/11 104/14 104/24 114/15 114/17 117/12 123/9 123/24 125/14 125/16 125/24 125/24 156/19 157/11 157/14 157/16 158/5 163/16 163/18 165/21 166/20 171/22 172/14 175/6 175/21 202/9 203/10 216/11 216/14 216/16 218/15 225/11 226/15
things [45] 7/4 11/3 20/7 23/5 23/24 27/14 28/1 32/24 34/18 83/10 88/16 90/15 91/20 91/20 92/14 93/10 94/13 94/17 95/20 112/4 120/13 124/1 124/14 124/21 136/7 158/20 159/24 159/25 162/2 179/2 181/19 198/8 203/10 215/18 216/21 216/22 216/23 219/18 229/16 231/15 231/16 231/20 231/21 240/25 244/22	though [8] 27/19 69/21 110/10 112/9 125/2 189/8 194/10 204/15	
think [33] 28/4 50/9 55/22 55/24 56/4 56/7 57/10 78/6 79/11 85/19 88/15 90/23 100/7 121/1 126/1 157/8 158/14 158/18 159/3 159/4 159/6 168/4 168/8 185/17 187/14 188/25 195/25 228/18 233/17 242/9 242/20 243/22 244/1	thought [15] 7/7 8/2 8/9 8/25 9/4 79/10 79/12 167/20 167/22 167/25 168/6 225/15 225/18 225/21 228/3	
thinks [1] 164/19 third [6] 82/13	thoughts [1] 147/6 thousand [4] 154/20 171/15 213/2 221/12 thousand-dollar [1] 213/2	
	thread [2] 58/4 65/10	
	three [20] 45/6 57/3 67/7 67/24 84/24 94/18 94/18 94/23 94/24 95/1 117/25 136/3 155/16 181/15	
	till [2] 94/4 170/9	
	time [56] 3/3 11/13 11/16 19/19 35/24 36/9 40/10 40/20 41/9 55/2 55/4 56/5 56/24 57/1 60/9 63/12 73/14 73/15 75/19 85/21 98/18 100/13	

T

USCA11 Case: 22-11150

Document: 53-10 Date Filed: 11/30/2022 Page: 215 of 254

time... [34]

105/17 105/25
 107/3 122/17
 122/21 122/24
 137/12 139/15
 150/8 150/9 154/17
 157/12 162/5 162/7
 162/9 162/16
 163/24 165/17
 165/19 165/23
 170/2 170/5 176/13
 188/13 193/21
 216/22 220/19
 222/11 228/5
 231/19 235/19
 239/14 240/12
 243/9

times [20] 12/13
 19/12 48/11 48/17
 56/17 56/23 84/1
 111/14 113/12
 132/6 135/8 145/19
 154/20 194/18
 194/18 197/24
 198/4 202/6 219/7
 241/1

timing [2] 58/18
 240/25

title [2] 103/4
 205/24

titled [1] 22/17

today [10] 51/18
 53/5 57/3 83/16
 141/7 152/10
 159/12 194/19
 230/9 244/13

today's [1] 194/19

together [5] 77/21
 78/15 97/15 184/19
 209/3

tokeny [1] 216/23

told [35] 6/20

27/24 28/12 28/16
 30/11 30/13 30/19
 30/23 38/22 40/10
 44/4 44/23 44/23
 45/24 50/5 57/5
 69/16 77/22 78/24
 97/8 97/10 112/2
 112/6 115/2 115/9
 138/6 138/9 144/5
 145/11 156/15
 178/14 179/17
 179/19 221/6
 222/24

tomorrow [10]

210/5 228/6 229/6
 236/4 236/7 236/15
 245/5 245/7 245/19
 246/3

tonight [2] 210/4

228/8

too [8] 88/14

113/18 141/17
 156/18 168/24
 170/15 207/19
 210/2

took [17] 17/22

18/3 18/5 18/8
 18/11 38/20 53/21
 63/2 69/1 69/3
 71/8 84/12 110/2
 220/12 226/7 226/8
 226/13

tools [1] 123/11

top [33] 10/11

36/1 59/8 59/19
 65/8 71/3 73/7
 81/15 102/14
 112/17 113/10
 116/15 116/20

118/3 133/2 149/17

151/14 158/21

158/22 173/2 173/7

173/16 182/19

194/24 197/13

199/8 209/24

212/16 213/7

213/16 214/11

215/21 220/2

topic [2] 137/25

228/8

total [3] 171/16

209/13 223/22

totally [3] 45/14

93/10 100/11

totals [1] 223/23

touch [5] 101/25

102/3 102/10

220/17 230/19

touched [1] 175/21

Toys [1] 107/22

traced [2] 8/18

10/24

track [3] 47/25

64/24 68/24

tracking [1] 84/18

Trading [29]

195/16 197/12

198/15 199/25

200/5 200/16

200/19 200/22

200/23 201/4

201/16 203/19

203/22 204/4 205/2

207/6 207/12 211/7

215/23 216/7

216/25 217/4 217/6

217/20 218/18

219/9 219/10 220/5

221/11

train [1] 7/6

trained [1] 124/15

transaction [3]

94/19 216/22 221/7

Transactions [1]

22/18

transcribed [1]

16/5

transcript [19]

T

transcript... [19]
 1/9 16/4 29/2 29/6
 31/4 31/21 37/2
 37/14 37/25 38/3
 38/8 38/14 38/19
 46/16 138/23
 178/13 247/10
 247/11 247/12

transcripts [9]
 12/25 14/20 14/21
 34/9 35/1 35/14
 35/15 38/6 126/5

transfer [21]
 15/21 111/18
 111/22 171/8
 187/23 189/11
 193/18 200/1
 212/23 213/7
 213/18 214/5 214/6
 214/12 214/18
 214/24 215/12
 215/13 216/24
 218/15 218/17

transferred [6]
 108/16 199/24
 201/4 215/10
 219/15 219/17

transferring [1]
 214/1

transfers [1]
 210/1

transition [2]
 28/8 194/4

transmitting [1]
 15/24

traveling [1]
 244/17

treated [2] 110/13
 244/10

trial [7] 1/9
 238/22 239/21
 240/12 241/4 241/5

241/5
tribute [3] 83/17
 83/19
tried [11] 3/3
 110/15 126/23
 128/7 128/9 128/15
 128/16 128/20
 129/6 137/10 204/1

trillions [1]
 102/5

Trinh [1] 16/20

trouble [3] 100/12
 100/13 204/2

true [49] 53/21
 54/3 58/7 62/4
 63/13 64/3 64/5
 65/12 68/15 68/18
 69/21 69/23 70/3
 70/12 77/22 79/1
 79/5 79/14 90/17
 90/18 111/20 116/9
 119/9 122/25
 123/21 125/7
 126/21 128/19
 129/9 134/15 135/5
 137/8 141/22 148/1
 156/19 172/10
 172/21 174/13
 174/15 183/1
 183/10 190/14
 190/16 203/5
 203/21 204/11
 220/12 229/9
 247/10

truly [1] 74/5

trust [174] 20/21
 20/23 20/23 21/1
 21/2 21/3 21/5
 21/7 21/9 21/22
 27/25 28/3 28/13
 29/17 29/18 29/21
 30/4 30/11 30/14
 30/16 30/20 30/23
 34/5 38/22 39/5

40/10 40/10 41/3
 40/13 42/4 42/7
 42/11 42/18 42/21
 43/16 43/19 43/20
 43/22 43/24 43/24
 44/1 44/2 44/3
 44/5 98/17 98/20
 99/8 99/12 99/20
 99/24 99/25 100/2
 100/3 101/11
 102/12 102/22
 106/9 107/11
 109/22 110/7
 119/18 138/14
 138/14 138/16
 140/11 140/16
 143/24 144/2 145/6
 145/12 145/12
 145/25 147/8
 156/23 156/24
 156/24 157/5 157/6
 157/6 158/11
 158/11 158/13
 169/17 169/22
 169/23 177/19
 178/1 178/3 178/6
 178/7 178/8 178/9
 178/15 179/15
 179/15 179/19
 179/23 179/23
 180/3 180/4 180/15
 181/3 181/4 181/4
 181/5 181/6 181/8
 181/9 181/21
 181/23 181/24
 181/24 182/1 182/2
 182/3 183/17
 183/22 184/7 184/9
 184/17 185/15
 186/1 186/3 186/8
 186/16 186/18
 187/8 187/8 190/21
 191/3 193/17
 194/15 194/23

T

T	trust... [41]	102/6 103/9 124/21 127/23 128/14 129/3 164/24 167/5 206/11 220/25 trying [29] 8/1 25/22 45/21 47/5 48/4 56/5 57/25 68/20 93/6 96/1 97/24 124/17 127/4 157/2 163/4 181/20 184/19 185/18 189/1 199/9 219/20 219/23 225/22 229/14 232/14 234/18 234/23 234/25 234/25 Tuesday [1] 84/21 Tulip [79] 42/3 42/4 42/7 43/15 43/19 43/20 43/22 43/24 43/24 44/1 44/2 44/2 44/5 169/22 177/16 178/3 178/6 178/8 178/9 178/15 179/15 179/19 179/23 180/3 180/15 181/3 181/4 181/4 181/5 181/8 181/22 181/24 181/24 182/1 182/2 182/2 184/7 184/9 184/17 185/15 186/3 186/17 195/15 196/10 196/14 197/12 198/14 198/15 199/21 199/25 200/4 200/9 200/16 200/19 200/22 201/4 201/10 201/15 201/16 203/19 203/22 204/4 205/2 207/6	207/12 211/7 215/23 216/7 216/25 217/1 217/4 217/6 217/20 218/18 219/1 219/9 219/9 220/5 221/11 Tulips [1] 169/23 turn [2] 24/13 68/11 turned [2] 24/14 140/20 tuxedo [1] 81/18 TV [1] 137/20 tweaking [1] 56/24 twins [1] 26/8 twisting [1] 158/9 Twitter [1] 128/12 two [62] 4/19 6/22 11/3 11/11 15/6 15/12 15/23 20/7 22/21 23/3 38/9 50/18 65/8 67/7 67/12 67/24 69/6 82/12 83/10 83/11 88/11 90/7 91/20 91/20 92/14 93/23 94/17 94/17 94/20 94/20 94/21 94/25 95/7 106/20 107/19 108/8 112/17 117/22 124/1 127/3 129/6 129/7 135/10 135/25 162/16 172/16 173/19 177/23 179/14 189/20 193/16 198/8 203/22 210/4 210/6 211/19 215/10 216/11 217/1 217/6 244/21 244/25 two-thirds [1] 82/12 Tyler [3] 25/20
	trust's [1] 147/23 trustee [15] 20/20 20/25 34/4 42/18 43/19 44/4 150/5 158/20 158/21 180/3 187/23 189/11 190/1 197/24 226/19 trustees [4] 43/15 43/22 43/25 44/2 trusts [11] 51/8 98/16 101/25 102/3 102/10 138/10 138/12 142/9 146/16 177/16 226/20 trustworthiness [3] 4/23 5/11 108/23 truth [2] 44/25 219/1 try [14] 26/8 46/24 74/21 93/9		

T	92/19 148/9 158/13 162/6 184/22 206/10 228/21 237/15 240/22 240/24 243/5 understood [1] 69/8 undertake [1] 202/5 unduly [5] 41/10 228/25 229/10 237/18 238/11 unfair [2] 239/16 240/18 unfortunately [1] 170/20 Union [2] 107/20 107/25 UNITED [7] 1/1 1/10 108/6 182/25 183/12 246/5 247/6 unless [1] 216/12 unlock [1] 152/8 unnecessary [2] 152/24 239/12 unravel [1] 58/2 until [14] 26/18 75/9 79/17 90/23 91/19 94/11 95/9 102/22 106/9 110/7 178/11 203/22 220/7 233/16 unusual [4] 5/16 242/10 242/15 242/15 up [149] 4/19 8/12 9/1 12/15 18/20 19/13 19/22 20/6 21/12 23/4 24/16 29/21 30/4 30/11 31/2 32/6 35/6 38/12 40/13 43/4 46/2 46/12 49/6 50/8 51/12 54/7	56/20 57/1 57/6 57/12 57/14 58/12 63/16 63/18 64/6 66/8 68/10 68/11 68/20 70/6 71/11 76/19 78/11 78/12 78/12 78/12 80/15 80/18 84/21 85/23 92/3 92/22 94/7 96/23 98/8 100/9 100/9 100/10 100/21 103/2 105/12 110/4 114/20 115/8 115/10 116/12 119/12 124/17 130/2 130/8 132/17 135/12 136/18 138/18 144/7 144/18 145/2 146/5 148/16 149/6 150/14 153/2 156/24 156/25 157/1 157/5 158/10 159/19 159/20 160/11 160/16 161/8 168/18 171/16 171/24 172/24 173/19 178/10 179/6 179/14 180/22 181/7 181/8 181/12 181/18 184/2 185/22 186/7 186/12 191/11 192/2 192/14 194/7 196/2 198/10 199/8 199/22 202/4 202/12 204/1 204/19 207/2 207/23 208/10 208/21 209/8 209/17 209/22 210/15 214/20
Tyler... [2] 25/23 26/3 type [6] 92/11 124/2 124/4 176/12 206/9 244/4 typed [2] 67/10 118/15	92/19 148/9 158/13 162/6 184/22 206/10 228/21 237/15 240/22 240/24 243/5 understood [1] 69/8 undertake [1] 202/5 unduly [5] 41/10 228/25 229/10 237/18 238/11 unfair [2] 239/16 240/18 unfortunately [1] 170/20 Union [2] 107/20 107/25 UNITED [7] 1/1 1/10 108/6 182/25 183/12 246/5 247/6 unless [1] 216/12 unlock [1] 152/8 unnecessary [2] 152/24 239/12 unravel [1] 58/2 until [14] 26/18 75/9 79/17 90/23 91/19 94/11 95/9 102/22 106/9 110/7 178/11 203/22 220/7 233/16 unusual [4] 5/16 242/10 242/15 242/15 up [149] 4/19 8/12 9/1 12/15 18/20 19/13 19/22 20/6 21/12 23/4 24/16 29/21 30/4 30/11 31/2 32/6 35/6 38/12 40/13 43/4 46/2 46/12 49/6 50/8 51/12 54/7	56/20 57/1 57/6 57/12 57/14 58/12 63/16 63/18 64/6 66/8 68/10 68/11 68/20 70/6 71/11 76/19 78/11 78/12 78/12 78/12 80/15 80/18 84/21 85/23 92/3 92/22 94/7 96/23 98/8 100/9 100/9 100/10 100/21 103/2 105/12 110/4 114/20 115/8 115/10 116/12 119/12 124/17 130/2 130/8 132/17 135/12 136/18 138/18 144/7 144/18 145/2 146/5 148/16 149/6 150/14 153/2 156/24 156/25 157/1 157/5 158/10 159/19 159/20 160/11 160/16 161/8 168/18 171/16 171/24 172/24 173/19 178/10 179/6 179/14 180/22 181/7 181/8 181/12 181/18 184/2 185/22 186/7 186/12 191/11 192/2 192/14 194/7 196/2 198/10 199/8 199/22 202/4 202/12 204/1 204/19 207/2 207/23 208/10 208/21 209/8 209/17 209/22 210/15 214/20
U	U.S [7] 1/23 11/8 11/12 11/16 11/22 12/4 48/21 Uh [6] 15/3 16/25 17/2 23/6 151/11 200/2 Uh-huh [6] 15/3 16/25 17/2 23/6 151/11 200/2 UK [2] 106/9 110/7 unavailable [1] 4/21 uncle [2] 55/23 57/10 under [23] 4/23 6/10 21/8 63/3 64/3 77/24 79/8 80/23 80/23 118/13 137/18 157/21 159/16 171/13 172/1 182/24 182/25 183/11 187/21 196/19 199/12 199/14 203/4 underlying [4] 75/13 108/23 237/18 237/25 underneath [5] 87/8 177/1 188/4 188/5 189/20 understand [18] 5/20 8/7 8/18 8/25 15/1 20/3 78/23	92/19 148/9 158/13 162/6 184/22 206/10 228/21 237/15 240/22 240/24 243/5 understood [1] 69/8 undertake [1] 202/5 unduly [5] 41/10 228/25 229/10 237/18 238/11 unfair [2] 239/16 240/18 unfortunately [1] 170/20 Union [2] 107/20 107/25 UNITED [7] 1/1 1/10 108/6 182/25 183/12 246/5 247/6 unless [1] 216/12 unlock [1] 152/8 unnecessary [2] 152/24 239/12 unravel [1] 58/2 until [14] 26/18 75/9 79/17 90/23 91/19 94/11 95/9 102/22 106/9 110/7 178/11 203/22 220/7 233/16 unusual [4] 5/16 242/10 242/15 242/15 up [149] 4/19 8/12 9/1 12/15 18/20 19/13 19/22 20/6 21/12 23/4 24/16 29/21 30/4 30/11 31/2 32/6 35/6 38/12 40/13 43/4 46/2 46/12 49/6 50/8 51/12 54/7

U

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page 219 of 254
up... [19] 215/2
217/13 217/21
221/17 222/13
223/2 224/17 225/2
225/6 225/19
225/21 228/6
229/17 230/4 230/5
233/3 234/6 235/11
235/12
update [2] 56/15
176/13
upload.ie [1]
56/16
us [87] 3/25 11/23
16/5 16/11 17/15
20/10 22/14 27/3
29/7 29/16 29/18
31/7 31/25 32/17
33/11 34/6 34/21
35/11 36/23 38/21
39/1 40/24 41/24
43/14 46/14 47/25
48/9 51/13 52/19
72/5 80/24 81/23
96/24 97/3 102/6
103/7 104/6 105/13
115/7 118/24
123/17 135/15
136/21 138/24
141/12 141/16
142/12 142/25
143/1 144/15
153/21 163/19
164/1 175/7 176/6
179/10 179/18
183/3 183/14
183/15 192/4
192/17 195/3
196/23 196/25
197/21 198/9
198/12 198/22
203/16 206/20

206/24 208/3 209/1
209/20 210/3 210/4
210/5 210/12
211/24 212/12
213/21 214/9
214/14 214/20
233/8 235/20
USA [2] 19/21 23/3
use [19] 15/17
29/23 63/21 76/1
79/15 93/6 120/14
123/23 123/23
147/16 162/15
163/22 163/24
165/6 165/7 167/3
170/20 228/25
233/15
used [24] 5/17
8/17 9/3 15/23
30/16 55/13 75/20
75/21 76/4 76/8
76/11 83/10 91/19
95/4 95/14 123/10
123/11 126/22
160/7 161/9 170/19
219/13 229/1 235/2
Usenet [1] 55/12
user [1] 75/17
using [8] 15/11
99/21 160/7 171/24
176/14 202/8
217/13 220/15
usually [1] 100/12
Uyen [6] 20/17
20/20 21/16 43/16
43/18 44/1

V

Vague [1] 22/22
validate [2] 92/10
94/8
validated [1]
150/10
validating [1]

178/24
validity [1] 14/20
valuable [1] 8/19
value [10] 8/8
8/20 8/20 9/7
161/6 241/11
241/15 241/22
242/16 244/6
variety [3] 27/5
56/16 235/9
various [6] 32/23
34/23 175/14
175/17 185/14
235/17
Vegas [2] 5/4
108/1
Vel [1] 3/18
Vela [278]
venture [4] 135/12
135/13 135/14
135/18
verbal [2] 80/3
177/18
verbally [1] 17/3
verdict [3] 238/17
240/1 240/2
verified [1]
150/10
verify [2] 130/16
154/14
version [10] 55/20
56/20 82/6 82/6
82/8 86/2 86/24
161/18 172/13
210/12
versions [3] 56/22
124/21 219/1
versus [3] 47/8
151/21 188/3
very [32] 5/8 5/17
17/5 26/3 26/24
55/2 55/4 57/18
77/22 78/25 95/4
96/1 100/6 103/16

V

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 220 of 254
very... [18] 114/2
 124/13 124/14
 124/19 127/11
 141/15 141/17
 156/13 161/12
 166/8 168/11
 200/25 205/13
 218/15 220/18
 236/18 243/19
 244/24
via [4] 55/6 77/20
 166/22 174/14
Victoria [2] 233/7
 234/9
video [26] 63/8
 89/17 90/11 91/10
 91/17 105/11 106/5
 123/19 125/5
 126/19 128/4 129/1
 129/18 156/3
 224/14 226/25
 227/2 227/14
 227/16 228/13
 228/17 230/12
 231/5 231/24
 236/13 239/18
view [1] 45/14
Vision [1] 136/20
vistomail [15]
 76/15 78/17 78/20
 78/25 79/14 79/16
 80/1 80/12 82/14
 83/8 85/1 85/4
 86/22 87/19 88/9
vistomail.com [4]
 75/22 76/2 76/5
 76/7
vitstomail.com [1]
 75/24
volume [1] 166/22
vote [3] 181/13
 181/15 181/17

voted [1] 181/16

voting [1] 202/9

vs [1] 1/6

vulnerability [1]
141/10

W

waited [1] 15/5

waiting [2] 107/13
222/15

Wales [4] 96/21
97/6 114/22 189/17

wallet [1] 171/10

wallets [4] 102/22
103/17 106/9 110/7

want [38] 7/5 15/1
28/23 42/8 48/12

50/7 64/18 68/24
90/13 92/6 92/19

95/19 99/21 100/9
101/4 113/25

126/13 130/15
137/20 137/20

162/15 162/15
163/3 164/25 166/5

166/10 167/1
167/13 176/12

203/10 207/6
215/18 230/15

230/25 231/20
232/19 242/11

245/11
wanted [23] 51/25

52/10 53/11 69/7
78/21 79/3 79/10

128/21 129/14
131/10 131/12

131/13 135/16
136/5 140/25 141/1

141/1 158/12 163/5
221/1 230/22

230/24 232/2
wants [5] 39/13

104/17 107/1 162/6

170/19

Warren [4] 116/4

116/5 163/18 170/6

Warren's [2]

163/14 163/16

was [396]

wasn't [19] 7/2

8/21 8/23 9/5

11/17 27/20 44/6
47/12 47/12 56/20

74/17 83/17 85/18
100/1 102/16

163/16 198/20
217/7 218/25

watching [1]

242/16

waters [2] 137/9

137/14

watts [3] 12/22

21/19 113/16

way [39] 8/3 17/17

25/17 29/12 29/16
39/12 42/20 45/23

52/16 53/10 64/20
66/2 70/14 82/13

83/19 84/24 93/9
95/11 96/12 97/10

111/3 115/2 115/18
124/22 139/21

160/10 164/3

172/14 172/15
176/19 176/19

188/2 221/1 227/5
232/11 233/23

236/4 241/20
245/10

Wayback [2] 86/3

170/12

ways [3] 15/19
106/20 226/22

we [318]

we'd [3] 179/19
229/2 245/13

we'll [11] 6/10

W

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 221 of 254
we'll [10] 13/5
14/25 60/23 79/19
104/13 109/24
168/16 186/11
193/25 243/23
we're [38] 4/16
4/21 11/9 26/18
29/2 34/2 47/25
48/4 51/5 53/14
53/20 60/14 74/8
74/22 86/8 100/11
124/25 138/22
144/21 151/9 162/5
162/13 169/4
173/11 182/17
191/16 209/11
221/23 222/8
222/10 226/23
228/7 228/11 230/6
235/24 238/4
243/25 244/16
we've [26] 17/19
19/14 37/17 37/25
44/12 44/15 46/4
48/11 48/16 65/5
96/20 98/19 113/12
126/5 138/9 163/9
191/9 201/15
207/12 210/24
212/19 217/15
239/17 242/10
242/13 243/21
wealthy [1] 241/18
weather [1] 171/13
week [3] 144/6
144/9 171/13
weight [3] 103/24
164/3 191/23
Welcome [5] 60/17
60/22 107/10
109/21 168/15
well [34] 14/25

20/19 21/11 26/2
26/13 28/2 30/8
53/25 54/2 59/8
59/10 66/3 76/17
79/25 114/7 138/14
141/16 144/5
145/19 149/18
158/23 159/18
160/15 161/23
174/3 174/9 178/10
179/15 195/24
206/2 215/18
221/15 240/23
244/2
went [14] 6/7 6/17
7/22 11/18 83/12
91/12 167/14
175/21 203/25
207/17 216/11
216/16 218/15
218/17
were [137] 3/3
5/10 5/13 6/9 6/22
7/8 7/12 7/12 7/12
8/2 10/17 10/17
11/12 14/12 14/18
15/17 20/21 21/1
25/19 27/19 27/21
27/21 29/23 29/24
30/6 30/17 30/24
33/16 33/24 35/1
38/21 38/23 39/6
44/16 44/16 45/15
45/16 45/18 45/21
45/22 48/6 52/25
53/6 53/8 55/10
56/23 63/3 79/1
88/11 91/23 92/5
93/3 93/12 94/9
94/16 97/16 98/4
98/6 99/20 100/2
107/17 108/3
108/21 108/22
110/2 110/6 112/4

112/4 112/6 112/10
121/22 123/5 123/7
128/15 132/5 132/6
133/22 135/15
135/22 135/24
135/24 136/2 136/3
136/4 136/4 141/8
142/17 142/19
143/14 145/6 148/1
148/5 148/11
148/20 148/22
149/1 149/4 155/16
156/8 157/21
158/11 159/2
159/13 159/15
159/16 163/19
164/10 164/21
165/2 165/3 165/20
166/8 166/22 170/3
170/7 171/24 179/3
179/17 181/19
190/18 190/22
210/14 211/15
215/11 216/10
216/14 216/22
219/11 219/24
220/1 224/22
230/19 231/15
231/16 235/9
235/16 244/23
weren't [4] 93/1
94/13 149/1 226/19
WEST [1] 1/2
Westlaw [1] 107/23
what [129] 5/3
9/22 10/15 10/15
12/5 12/6 13/4
14/20 14/23 17/19
20/6 20/6 20/18
20/22 28/16 31/6
38/20 39/7 45/24
48/6 49/4 55/12
57/24 61/2 61/20
62/3 63/17 66/3

W

USCA11 Case: 22-11150 Document: 53-10 Date Filed: 11/30/2022 Page: 222 of 254
what... [101]
67/25 68/18 70/12
73/10 77/22 78/5
78/23 79/25 82/18
82/20 82/20 89/10
90/14 92/2 93/10
93/14 94/5 97/23
98/5 99/9 99/12
100/6 104/5 105/6
106/7 106/12
106/18 108/16
109/9 111/12
111/19 112/13
113/7 120/8 121/16
121/25 123/10
123/15 126/10
132/12 133/6 133/8
134/25 135/13
138/8 140/18 141/9
144/5 147/15 148/7
148/19 149/15
151/7 154/3 154/20
156/16 156/25
162/21 163/3 163/6
164/2 164/15
164/19 165/9
165/11 166/11
167/2 174/6 178/24
181/19 184/16
184/22 185/18
186/7 188/25 189/7
189/7 191/1 194/25
198/6 198/20 199/9
199/20 201/17
202/3 202/20
208/11 213/3 213/9
217/12 222/13
228/11 232/11
235/13 236/16
236/22 237/20
239/21 241/6 241/8
243/25

what's [2] 87/9

152/9
whatever [1] 100/8
WhatsApp [1] 116/8
whatsoever [2]
176/21 203/22
when [72] 3/6 7/12
14/15 20/15 23/16
23/18 23/21 24/1
24/9 24/13 40/7
45/8 47/19 50/4
50/4 51/7 54/21
55/4 55/8 55/18
56/10 56/18 67/23
68/3 70/5 72/19
79/8 79/18 92/3
92/14 92/15 94/9
95/3 95/21 99/14
99/15 99/16 99/17
99/17 100/7 100/7
100/14 101/5
105/17 123/4 124/2
124/16 133/22
140/15 157/21
159/1 159/1 162/14
165/15 165/20
166/4 176/18
195/20 215/15
221/15 224/8
229/15 229/18
230/6 235/19
239/14 239/20
240/16 240/18
241/9 242/1 245/1
Whenever [1]
235/21
where [40] 5/9 7/5
7/23 8/14 10/13
12/4 12/14 27/10
28/2 32/24 34/22
38/21 44/12 49/14
62/1 63/24 90/16
94/22 94/24 109/2
110/6 118/13

121/17 127/4

125/1 136/7 143/6
144/17 147/19
152/15 160/9
164/15 169/5 174/5
178/14 196/10
196/12 214/6 224/1
243/13
WHEREOF [1] 247/14
whether [23] 5/12
14/25 26/4 33/20
33/22 35/15 38/8
48/1 48/5 58/11
60/25 65/12 69/18
74/17 79/25 83/7
89/3 102/9 141/14
232/9 237/23 240/6
242/5
which [57] 4/21
5/3 5/4 5/6 10/19
18/6 19/13 20/23
27/4 28/18 29/24
32/4 44/2 47/22
49/7 51/12 53/5
55/24 81/24 85/6
85/9 86/20 90/23
92/1 96/24 97/10
108/5 108/9 108/10
110/3 114/21
118/17 121/17
153/7 154/10
159/20 163/8
163/11 168/3 170/2
170/11 175/3
177/22 178/4
183/18 186/1 186/9
187/11 190/7 196/3
201/18 202/8
206/20 215/2
217/21 221/2 244/1
while [4] 40/8
92/24 122/20
231/19
whitepaper [7]

W

USCA11 Case: 22-11150
whitepaper... [7]
 45/8 45/9 54/21
 55/9 57/17 76/9
 78/3
who [40] 4/1 4/14
 12/10 14/22 20/20
 47/21 56/3 56/8
 79/11 92/5 94/2
 95/23 100/15
 100/17 113/16
 122/14 127/11
 136/2 136/3 136/4
 136/4 157/25 158/4
 162/2 168/10 177/4
 181/16 190/20
 197/24 198/2 198/3
 198/6 215/11
 216/14 216/17
 216/18 234/25
 235/1 239/10
 244/17
whoever [1] 75/20
WHOIS [2] 92/1
 92/2
WHOIS.org [1]
 92/11
whole [8] 25/15
 25/17 94/8 139/20
 190/25 229/15
 229/16 231/14
Whom [1] 187/18
whomever [4]
 111/11 165/11
 172/21 173/25
whose [2] 153/11
 242/21
why [21] 26/11
 33/15 33/23 75/9
 88/23 89/2 95/19
 100/2 117/15
 124/25 127/10
 127/18 166/24

182/6 186/11
 195/25 227/11
 230/5 236/13
 237/13 240/16
wife [23] 18/21
 21/19 21/21 22/17
 68/23 69/12 69/12
 69/14 102/11
 102/16 102/17
 111/24 112/2 112/6
 112/20 113/16
 153/12 158/17
 159/25 178/11
 216/17 223/9
 223/11
wife's [2] 69/3
 158/20
Wiki [2] 170/10
 170/10
will [69] 7/18 9/1
 13/18 21/3 26/4
 27/14 28/4 31/17
 33/9 42/7 51/16
 51/17 57/12 64/22
 67/13 68/4 88/1
 92/11 102/4 102/5
 103/25 104/13
 105/19 109/5 121/8
 121/16 124/17
 124/22 127/14
 131/16 136/12
 141/20 141/21
 151/1 161/8 161/9
 162/5 168/10 171/8
 171/11 171/14
 176/18 176/19
 176/20 178/22
 179/1 179/4 189/21
 191/24 193/2
 197/23 199/9
 199/17 199/19
 201/18 202/5
 202/10 210/1 210/6
 229/6 230/15 235/2

236/4 238/16
 238/17 238/18
 240/14 240/19
 245/5
willing [2] 129/10
 129/11
Wilson [2] 34/17
 223/11
Winklevoss [3]
 25/20 26/3 26/8
Wins [1] 68/5
wipe [11] 126/23
 127/23 128/17
 129/10 130/1 132/2
 132/4 132/6 132/8
 132/11 134/23
wiped [4] 8/15
 127/17 127/18
 129/24
wiping [2] 130/6
 131/24
withdrawn [2]
 234/15 234/17
within [5] 5/5
 109/7 172/4 221/6
 236/2
without [20] 8/17
 69/23 69/25 69/25
 70/1 70/16 93/7
 155/8 160/5 162/2
 165/8 175/20
 181/14 196/6
 212/25 232/14
 237/22 237/24
 238/2 243/2
witness [45] 21/13
 24/17 33/5 40/15
 58/13 64/7 66/9
 71/11 73/9 76/20
 80/19 82/22 85/24
 98/9 100/22 103/21
 104/16 104/18
 112/16 116/13
 117/12 119/4 130/9

W

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page: 224 of 254
witness... [22]
 132/18 148/15
 149/7 150/14
 165/22 166/12
 166/20 172/25
 177/11 180/23
 191/21 204/20
 210/16 212/8
 221/18 223/3 232/8
 233/4 233/18 238/6
 242/18 247/14
woman [2] 17/7
 20/20
won [3] 220/23
 221/1 221/3
won't [2] 21/4
 29/17
word [4] 83/20
 93/6 182/2 233/22
worded [3] 54/2
 134/19 141/24
words [6] 130/1
 148/14 171/19
 181/22 182/1
 186/17
work [10] 8/17
 26/4 55/18 69/5
 95/1 99/8 109/23
 156/17 162/2 208/5
worked [3] 77/21
 160/7 190/24
working [7] 8/9
 57/22 61/5 61/12
 122/2 231/20 233/2
works [8] 25/15
 83/20 94/3 95/11
 111/3 111/14
 225/12 235/21
world [9] 9/6
 56/12 67/14 68/4
 102/4 133/23
 175/15 175/18

219/12

worry [2] 112/10 195/21 196/4
 114/9
worse [1] 232/12
worst [3] 32/5
 113/21 114/3
worth [19] 9/11
 9/12 9/12 9/13
 26/8 236/25 237/4
 237/7 237/16
 238/18 238/24
 239/5 240/10 241/8
 241/21 242/7
 242/22 244/6 245/2
worthless [4] 8/4
 8/5 8/7 10/18
would [105] 5/6
 5/18 9/15 21/5
 21/7 29/23 33/3
 34/15 41/6 43/6
 45/20 47/5 47/5
 52/2 52/19 53/10
 69/25 69/25 70/2
 71/23 73/2 73/4
 73/8 74/15 77/22
 78/7 86/13 89/5
 89/10 89/12 91/11
 94/20 95/1 97/10
 97/11 98/6 104/19
 106/3 107/15 109/9
 109/13 112/23
 115/3 115/18
 115/19 117/15
 120/22 123/9
 123/12 124/2 124/5
 125/3 126/23 127/8
 127/16 127/23
 128/18 136/6 141/5
 141/18 148/4
 153/13 154/14
 162/7 164/16
 164/23 166/5 166/8
 172/22 174/1 177/6
 177/9 182/3 182/3

190/24 190/25

204/16 206/20
 208/7 209/15
 216/18 216/19
 216/19 217/9
 220/21 220/23
 227/7 228/1 230/14
 235/18 237/14
 238/13 240/16
 241/21 241/23
 243/2 243/12 244/2
 244/6 244/9 244/25
 245/1 245/4
wouldn't [5] 52/16
 52/24 122/24
 181/15 216/20
WRIGHT [637]
Wright's [26] 7/1
 7/2 19/18 42/3
 49/7 78/12 88/21
 96/25 100/23 106/3
 109/12 114/21
 125/3 128/3 128/25
 129/17 151/23
 156/2 183/4 224/13
 231/4 231/23 235/1
 241/8 241/21 242/7
Wrightson [2]
 16/19 37/18
write [6] 65/15
 83/20 84/1 85/12
 85/13 199/13
writes [1] 147/5
writing [2] 17/7
 77/24
written [3] 27/20
 45/8 101/20
wrong [20] 8/22
 8/23 15/12 43/22
 43/25 52/9 72/9
 90/17 111/6 182/3
 191/15 191/22
 208/9 210/11 214/8

W	53/7 54/16 55/4 55/16 58/20 59/14 59/24 60/8 61/2 61/17 61/18 61/20 63/25 64/2 64/20 64/22 67/6 67/9 67/15 67/17 68/7 68/11 69/8 69/10 69/15 69/19 70/5 70/19 71/22 73/18 75/19 76/14 76/16 77/14 77/16 77/19 78/2 78/5 78/16 78/21 79/2 79/12 80/6 81/4 81/17 81/20 81/22 83/7 83/9 83/11 84/14 84/23 85/3 88/3 88/11 91/23 91/25 93/2 93/9 93/18 93/22 96/18 96/22 97/9 98/3 98/15 98/18 100/5 100/14 100/18 101/12 104/13 104/18 106/22 111/10 111/15 112/5 113/15 113/17 113/19 116/5 118/2 118/9 119/20 120/10 120/13 120/13 125/22 126/14 129/14 130/13 131/3 132/15 132/23 134/10 138/8 140/14 142/21 142/24 144/20 145/3 145/8 145/10 145/20 147/1 147/4 148/25 149/2 151/18 155/3 156/6 157/22 158/18 158/19 158/22	159/9 159/11 160/15 162/9 163/15 169/3 169/7 170/5 172/20 172/23 173/18 174/19 175/1 176/25 177/3 177/8 178/2 178/5 179/1 180/1 180/18 180/21 181/25 182/22 183/2 183/21 183/24 184/6 184/8 186/5 186/19 187/8 188/3 188/3 189/9 190/3 194/21 194/22 195/7 195/9 196/21 197/4 197/10 197/14 198/20 199/8 200/6 201/9 201/12 201/14 204/24 205/23 206/1 207/14 207/18 208/17 209/15 210/20 211/9 211/19 211/21 213/17 216/3 217/18 219/16 222/11 222/19 223/13 225/21 226/1 226/17 229/18 229/22 230/21 230/24 235/11 236/22
wrong... [5]	219/24 220/2 220/2 220/8 232/10 wrote [10] 63/13 65/13 67/4 83/17 83/19 83/25 84/1 132/12 132/14 190/3	160/15 162/9 163/15 169/3 169/7 170/5 172/20 172/23 173/18 174/19 175/1 176/25 177/3 177/8 178/2 178/5 179/1 180/1 180/18 180/21 181/25 182/22 183/2 183/21 183/24
wyno.ca [1] 113/14		
Y		
yeah [9] 37/9 143/16 144/22 168/1 179/21 180/17 199/1 218/6 237/6	78/2 78/5 78/16 78/21 79/2 79/12 80/6 81/4 81/17 81/20 81/22 83/7 83/9 83/11 84/14 84/23 85/3 88/3 88/11 91/23 91/25 93/2 93/9 93/18 93/22 96/18 96/22 97/9 98/3 98/15	184/6 184/8 186/5 186/19 187/8 188/3 188/3 189/9 190/3 194/21 194/22 195/7 195/9 196/21 197/4 197/10 197/14 198/20 199/8 200/6 201/9 201/12 201/14 204/24 205/23
year [9] 20/13 20/16 22/20 27/15 170/15 192/21 204/14 208/4 217/13	98/18 100/5 100/14 100/18 101/12 104/13 104/18 106/22 111/10 111/15 112/5 113/15 113/17	206/1 207/14 207/18 208/17 209/15 210/20 211/9 211/19 211/21 213/17 216/3 217/18
years [14] 8/24 15/6 15/12 22/21 49/18 68/20 69/6 134/9 172/2 178/11 203/22 204/5 209/13 217/1	113/19 116/5 118/2 118/9 119/20 120/10 120/13 120/13 125/22 126/14 129/14 130/13 131/3 132/15 132/23	219/16 222/11 222/19 223/13 225/21 226/1 226/17 229/18 229/22 230/21 230/24 235/11 236/22
yes [239] 6/19 7/14 7/21 9/7 10/6 10/7 11/17 12/13 12/24 13/11 17/4 17/12 18/19 19/12 20/6 21/9 21/18 21/21 21/23 21/25 22/3 22/19 22/24 23/12 26/17 26/21 28/1 30/5 30/8 32/1 35/10 36/21 39/16 39/22 40/6 40/22 44/23 45/12 45/18 47/20 50/7 50/22 51/20 51/24 52/10 52/12 52/16	134/10 138/8 140/14 142/21 142/24 144/20 145/3 145/8 145/10 145/20 147/1 147/4 148/25 149/2 151/18 155/3 156/6 157/22 158/18 158/19 158/22	yesterday [6] 4/18 6/17 7/6 7/22 74/18 163/10 yet [7] 63/18 102/3 127/16 146/10 186/10 186/10 200/7 York [2] 214/3 214/4

Y

USCA11 Case: 22-11150 Document 53-10 Date Filed: 11/30/2022 Page: 226 of 254
you [1450] 169/7
You'd [1] 31/4
you'll [9] 102/14 111/3
170/10 206/10
212/14 215/15
218/2 236/6
you're [69] 8/3
8/19 11/11 15/4
21/24 42/20 44/16
45/23 46/23 52/16
53/10 56/20 58/3
74/4 78/23 78/24
90/22 91/21 95/7
97/24 106/19
106/20 109/10
110/22 114/3
126/10 126/15
127/4 129/7 130/1
133/3 133/25 135/2
137/17 140/3
140/16 140/18
145/10 145/17
158/9 160/15
176/14 187/14
193/1 199/9 199/20
199/20 201/17
201/17 203/25
204/2 208/10
210/18 214/1
215/18 217/9
217/11 217/12
218/16 219/20
219/23 220/2
220/14 220/15
225/25 234/20
235/25 236/3 242/2
You're misstating
[1] 135/2
you've [9] 17/23
30/11 59/9 75/16
79/6 83/10 163/24

180/14 180/19

Young [2] 135/21
136/3
your [384]
yours [2] 147/12
190/1
yourself [31]
12/20 12/22 21/15
50/14 58/16 66/11
67/1 98/14 99/5
99/22 101/2 112/19
113/12 130/11
130/22 132/21
133/17 140/5
145/23 145/24
146/13 155/8
155/10 174/7
174/10 191/14
204/22 221/21
222/8 223/8 233/6
YouTube [5] 227/14
227/16 228/13
236/13 239/18
yvette [6] 1/23
1/25 247/5 247/17
247/17 247/19

Z

ZACK [2] 1/16 3/23
ZALMAN [2] 1/21
4/10
Zhul [2] 41/8
41/20
zoom [62] 9/25
14/1 17/16 19/18
21/17 22/13 25/14
26/22 26/23 27/10
34/21 36/24 37/7
37/10 39/2 40/25
41/25 46/19 49/7
58/14 59/1 65/3
65/7 66/20 86/25
88/1 100/23 100/25
112/16 115/10

115/11 116/17

122/1 123/14 127/4
139/3 143/1 143/3
146/6 153/22 154/9
154/10 168/20
171/5 179/12 187/3
187/3 190/9 192/15
195/4 195/10 199/1
199/17 199/19
202/1 205/15
205/16 210/21
212/16 213/10
213/12 225/11
zoomed [1] 201/19

845

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF FLORIDA
3 WEST PALM BEACH DIVISION
4 CASE NO. 9:18-cv-80176-BB

5 IRA KLEIMAN, as the personal representative
6 of the Estate of David Kleiman, and W&K Info
7 Defense Research, LLC,

8 Plaintiffs,

November 15, 2021
9:58 a.m.

10 vs.

11 CRAIG WRIGHT,

12 Defendant.

13 Pages 1 THROUGH 224

14 TRANSCRIPT OF TRIAL DAY 9
15 BEFORE THE HONORABLE BETH BLOOM
16 UNITED STATES DISTRICT JUDGE
17 And a Jury of 10

18 Appearances:

19 FOR THE PLAINTIFF: ROCHE FREEDMAN, LLP
20 DEVIN FREEDMAN, ESQ.
21 KYLE ROCHE, ESQ.
22 200 South Biscayne, Suite 5500
23 Miami, Florida 33131

24 BOIES SCHILLER & FLEXNER
25 ANDREW BRENNER, ESQ.
26 STEPHEN N. ZACK, ESQ.
27 STEPHEN LAGOS, ESQ.
28 100 Southeast 2nd Street, Suite 2800
29 Miami, Florida 33131

30 FOR THE DEFENDANT: RIVERO MESTRE, LLP
31 ANDRES RIVERO, ESQ.
32 JORGE MESTRE, ESQ.
33 AMANDA M. MCGOVERN, ESQ.
34 ZALMAN KASS, ESQ.
35 MICHAEL A. FERNANDEZ, ESQ.
36 2525 Ponce de Leon Boulevard, Suite 1000
37 Coral Gables, Florida 33134

38 COURT REPORTER: Yvette Hernandez
39 U.S. District Court
40 400 North Miami Avenue, Room 10-2
41 Miami, Florida 33128
42 yvette.hernandez@flsd.uscourts.gov

43 Yvette Hernandez, Official Court Reporter

44 400 North Miami Avenue, 10-2

45 Miami, Florida 33128

46 (305) 523-5698

1 **I N D E X**

2 Certificate..... 224

3 **W I T N E S S**4 **ON BEHALF OF THE PLAINTIFF:** **PAGE**5 CRAIG WRIGHT
6 CONTINUED DIRECT EXAMINATION BY MR. FREEDMAN 67 DR. MATTHEW EDMAN
8 DIRECT EXAMINATION BY MR. ROCHE 2039 **E X H I B I T S**

EX. NO.:	OFFERED	ADMITTED
Plaintiffs' 137	15	15
Plaintiffs' 727	27	28
Plaintiffs' 113	42	42
Plaintiffs' 166	44	44
Plaintiffs' 181	50	50
Plaintiffs' 191	61	62
Plaintiffs' 217	63	63
Plaintiffs' 229	65	65
Plaintiffs' 216	69	69
Plaintiffs' 350	71	71
Plaintiffs' 241	74	74
Plaintiffs' 256	76	76
Plaintiffs' 257	81	81
Plaintiffs' 248	86	87
Plaintiffs' 296	94	94
Plaintiffs' 301	98	99
Plaintiffs' 781	103	104
Plaintiffs' 685	107	107
Plaintiffs' 230	119	119
Plaintiffs' 308	120	120
Plaintiffs' 310	122	123
Plaintiffs' 315	123	123
Plaintiffs' 337	124	124
Plaintiffs' 398	125	125
Plaintiffs' 059	126	126
Plaintiffs' 134	127	127
Plaintiffs' 140	128	128
Plaintiffs' 142	128	128
Plaintiffs' 209	129	129
Plaintiffs' 210	130	130
Plaintiffs' 211	131	131

1 **E X H I B I T S** (Continued)

2 EX. NO.:	3 OFFERED	4 ADMITTED
5 Plaintiffs' 213	6 132	7 132
8 Plaintiffs' 214	9 132	10 132
11 Plaintiffs' 215	12 133	13 133
14 Plaintiffs' 219	15 134	16 134
17 Plaintiffs' 223	18 135	19 135
20 Plaintiffs' 224	21 137	22 137
23 Plaintiffs' 274	24 138	25 138
26 Plaintiffs' 313	27 138	28 138
29 Plaintiffs' 326	30 139	31 140
32 Plaintiffs' 578	33 140	34 140
35 Plaintiffs' 598	36 140	37 141
38 Plaintiffs' 664	39 141	40 141
41 Plaintiffs' 695	42 142	43 142
44 Plaintiffs' 055	45 145	46 145
47 Plaintiffs' 135	48 146	49 147
50 Plaintiffs' 514	51 147	52 147
53 Plaintiffs' 538	54 148	55 148
56 Plaintiffs' 540	57 149	58 149
59 Plaintiffs' 630	60 150	61 151
62 Plaintiffs' 799	63 162	64 162
65 Plaintiffs' 546	66 164	67 164
68 Plaintiffs' 720	69 164	70 164
71 Plaintiffs' 824	72 166	73 166
74 Plaintiffs' 187	75 167	76 168
77 Plaintiffs' 853.2	78 169	79 169
80 Plaintiffs' 856	81 171	82 171
83 Plaintiffs' 853.3	84 174	85 174
86 Plaintiffs' 146	87 177	88 177
89 Plaintiffs' 869	90 184	91 184
93 Plaintiffs' 853.4	94 190	95 190
97 Plaintiffs' 823.1	98 211	99 211
100 Plaintiffs' 823.2	101 211	102 211
103 Plaintiffs' 823.3	104 211	105 211
106 Plaintiffs' 799.1	107 216	108 216

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1 (Call to order of the Court, 9:58 a.m.)

2 THE COURT: Good morning to everyone. It's good to
3 see everyone. Hope everyone had a nice weekend.

4 Let's go ahead and call the case and we'll get
5 started.

6 COURTROOM DEPUTY: Calling Civil Case Number 18-80176,
7 Ira Kleiman v. Craig Wright. Counsel, please state your
8 appearances for the record, starting with Plaintiffs' counsel.

9 MR. FREEDMAN: Good morning, Your Honor. Devin
10 Freedman for the Plaintiffs.

11 THE COURT: Hi, good morning.

12 MR. BRENNER: Good morning, Your Honor. Andrew
13 Brenner for the Plaintiffs.

14 MR. ROCHE: Good morning, Your Honor. Kyle Roche for
15 Plaintiffs.

16 MR. LAGOS: Good morning. Stephen Lagos for
17 Plaintiffs.

18 MR. ZACK: Stephen Zack for the Plaintiff, Your Honor.

19 THE COURT: Good morning.

20 MR. BRENNER: Mr. Kleiman is here with us and Dorian
21 Vela is here with us too.

22 THE COURT: Good morning to each of you.

23 MS. MCGOVERN: Good morning, Your Honor. Amanda
24 McGovern for Dr. Wright.

25 MR. RIVERO: Good morning, Judge. Andres Rivero for

1 Dr. Wright.

2 MR. KASS: Good morning, Your Honor. Zalman Kass for
3 Dr. Wright.

4 MR. MESTRE: Jorge Mestre for Dr. Wright.

5 MR. FERNANDEZ: Good morning, Your Honor. Michael
6 Fernandez for Dr. Wright.

7 MS. MCGOVERN: Your Honor, we obviously have our
8 client, Dr. Wright, and Mr. Amit Shah and Sarah Gonzalez are
9 present.

10 THE COURT: All right. Good morning to everyone.

11 Good to see everyone. I'm happy to report that our jurors are
12 all healthy and they are all here. So is there anything that
13 we need to address before we continue with the testimony?

14 MR. FREEDMAN: Your Honor, there's just one thing. We
15 sent over a list of 62 documents to the Defense on Tuesday of
16 last week asking if they would object to the admission of those
17 documents. They have advised us this morning that they object
18 to all of them so there will be a module with Dr. Wright where
19 we go through a lot of documents. I just ask that you bear
20 with us, and that they be ready to state their position so we
21 can try to get through quickly.

22 THE COURT: All right. Certainly.

23 All right. Dr. Wright, if you want to come back on
24 the witness chair.

25 All right. And let's go ahead and bring in the

jurors.

(Before the Jury, 9:59 a.m.)

THE COURT: Good morning, Ladies and Gentlemen.

Please be seated.

It is so good to see each of you healthy. I hope you had a nice holiday weekend and ready to get back to work. I appreciate your promptness, as always, and we're ready to proceed.

Dr. Wright, let me remind you, you were previously placed under oath and we will continue with the testimony.

DIRECT EXAMINATION [CONTINUED]

BY MR. FREEDMAN:

Q. Good morning, Dr. Wright.

A. Good morning, Mr. Freedman.

Q. Dr. Wright, last week when we left off, we were going through this timeline.

MR. FREEDMAN: Your Honor, can you see the page?

THE COURT: Yes.

BY MR. FREEDMAN:

Q. We were going through this timeline and I just want to recenter us to where we were.

So Dave Kleiman dies on April 26th, 2013. You find out that Dave Kleiman has passed away on April 30th, 2013. You respond to a message from Carter Conrad and Patrick Paige.

On July 25th of 2013, you file a lawsuit against W&K.

1 In September of 2013, you file for GST tax refunds from the
2 Australian Taxation Office.

3 January 20th of 2014, you find out that the Australian
4 Taxation Office has denied your refund request.

5 MS. MCGOVERN: Objection, Your Honor. Improper line
6 of questioning with respect to the statement of the evidence on
7 the record by counsel.

8 THE COURT: All right. Do you want to ask it in the
9 form of a question? I think this is merely a recap because we
10 were gone for the holiday. So unless this is disputed in terms
11 of these dates --

12 MS. MCGOVERN: It is disputed, Your Honor.

13 THE COURT: All right. Mr. Freedman, why don't you
14 ask the question and you can refer back to any exhibits that
15 you used previously.

16 MR. FREEDMAN: Sure.

17 BY MR. FREEDMAN:

18 Q. Dr. Wright, do you recall looking at a document where we
19 saw that the Australian Taxation Office rejected your refunds
20 request on January 20th of 2014?

21 A. No. Actually, what I recall is you misstating everything
22 completely. You see, what you failed to actually do, over here
23 you don't have GST or VAT. So let me try and explain that a
24 little bit to you.

25 The way that this works is you have input and output

1 credits. You cannot claim from America. There's no credits
2 for America. It's only transactions within Australia. So
3 where he's showing you that, it's only half of the
4 transactions. So he's saying \$10.5 million refund. The
5 reality here is the transfer into those companies was actually
6 \$11 million debt.

7 So the full side of this was not a refund. What actually
8 happened was the tax office accepted the \$11 million debt.
9 Then they said: "Oh, we're going to have to validate the
10 10.5 million refund."

11 So, rather than having a half-million-dollar debt for my
12 companies, the tax office said: "We want the \$11 million
13 within three weeks, but we'll take as long as we want to give
14 you back the other 10.5 of that."

15 What that means is effectively it wasn't a dispute over a
16 refund. It was a dispute over how much I had to pay them. The
17 actual bit that he's misinforming you on is that that wasn't
18 even rejected. That first one, we actually got paid. We had
19 to fight to have the balanced transaction, because if you're
20 rejecting half of it, and not the other half, that's rather
21 unfair. Like it's: "We'll take the evidence that you owe us
22 money, but then not give you the money back."

23 So the complete thing of what he's saying is the timeline
24 is a complete fabrication. There's no honesty in that
25 timeline. It completely ignores the fact that I contacted his

1 fiancee. It completely ignores the continuous filings every
2 three months of GST. It completely ignores the constant fight
3 we had with the ATO. It wasn't because he's saying my first
4 GST fight started in June 2009. Not September 2013, June 2009.
5 So this timeline is just a lie.

6 MR. FREEDMAN: Ms. Vela, can you please put up P637,
7 and let's go to Page 3. And it is in evidence.

8 Can we please publish to the jury.

9 Ms. Vela, can you zoom in on Paragraph 6 for me from
10 the Australian Tax Office.

11 BY MR. FREEDMAN:

12 Q. Dr. Wright: "On January 20th, 2014, we issued a letter to
13 each of the related entities advising that we would continue to
14 hold the refunds."

15 January 20th, 2014, and then --

16 MS. MCGOVERN: Objection, Your Honor. Is that -- I
17 didn't understand the question. I didn't hear the question.

18 THE COURT: Well, do you want to have an
19 acknowledgment of the exhibit that's in evidence? I mean
20 that's what's being referred to.

21 MS. MCGOVERN: Yeah, I didn't hear the question, Your
22 Honor.

23 MR. FREEDMAN: Ms. Vela, can you please put up P175.

24 Let's go to Page 1.

25 THE WITNESS: Sorry, was I --

1 BY MR. FREEDMAN:

2 Q. We then looked at -- there's no question pending,
3 Dr. Wright.

4 We then looked at an email from John Cheshire, your CFO, to
5 Andrew Sommer, your lawyer, and yourself, where he's writing to
6 the Australian Taxation Office, Des McMaster. And he says:
7 "Hi, Des. Thank you for making the time to get together on
8 Monday. I have been out of the loop since on other business,
9 hence my delay in getting back to you. The following are the
10 salient points in terms of time drawn from our meeting:
11 Strasan and Pholus, more information regarding W&K.

12 "You have since asked for director details and consents for
13 W&K. Attached. You have all the agreements between W&K and
14 Wright and copies of judgments."

15 February 6th, 2014, the Australian Taxation Office starts
16 asking questions.

17 MS. MCGOVERN: Your Honor, I object to the extent --

18 THE COURT: What's the question, Mr. Freedman?

19 BY MR. FREEDMAN:

20 Q. Does the Australian Taxation Office start looking into W&K
21 on February 6th of 2014?

22 A. No. The tax office never looked into W&K. They looked
23 into the trusts they held and the companies. And as I said,
24 they started that in June and July of 2009. So, I'm sorry.
25 The timeline is a complete fabrication. It has no reality.

1 Q. Dr. Wright, W&K -- sorry. Please complete your answer.

2 A. I was going to say the document you put up before for the
3 GAAR panel, that was the start of the investigation. I went to
4 the GAAR panel, which is the equivalent of a court in this
5 country, and what he's not putting up is the fact that I was
6 exonerated. I'm sorry to tell you that the GAAR panel happened
7 and the GAAR panel did not uphold the tax office statements.

8 So it's one thing to say: "Oh, there's a charge here."
9 Like I'm here now. It's another to find whether I'm basically
10 being charged with something or not. I wasn't. My companies
11 weren't.

12 MR. FREEDMAN: Ms. Vela, can you please put up P117,
13 Page 1.

14 Can you zoom into the email from Dr. Wright dated
15 February 11th, 2014.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, do you recall that we then looked at this
18 exhibit, which occurred five days after the email we just saw
19 from your accountant and the ATO talking about W&K, and you
20 say: "Hello, Louis. Your son, Dave and I are two of three key
21 people behind Bitcoin"?

22 A. I see the email, yes.

23 Q. Okay. And then do you recall that I wrote on the timeline:
24 February 11th, 2014, CSW tells Louis Kleiman" -- and I made two
25 red circles around the two days showing that there was just

1 five days between the Australian Taxation Office reaching out
2 about W&K and you reaching out to Louis Kleiman?

3 A. Again, no, they weren't reaching out about W&K. There's no
4 American taxation in Australia. Again, there's no GST on
5 American transactions. Again, you're ignoring the entire sort
6 of back history of this with the fight that I had that
7 culminated in a court case that ended in February of 2013. So
8 I started a court case following the June/July 2009 GST issues
9 with the tax office.

10 That actually went into where they tried to bankrupt me in
11 2011. It went to court in 2011. For two years, I was spending
12 maybe three million dollars a year on legal and accounting fees
13 until in December 2012 the tax office finally admitted they'd
14 lost. And in February of 2013, I won the case. Unfortunately,
15 the costs of the thing didn't even recover a tenth of my costs,
16 but that's how court cases work.

17 MR. FREEDMAN: Ms. Vela, can you please put on the
18 screen P120, which is also in evidence, and can we go to Page
19 6, please.

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, do you then recall that I showed you this email
22 from yourself to now Ira Kleiman, dated February 14th, 2014,
23 where you tell him that Dave Kleiman was involved with that
24 PDF, the Bitcoin Whitepaper, he had the Vistomail account,
25 Satoshi Nakamoto Vistomail account, and that he should start

1 looking for private keys and wallet.dat files? Do you recall
2 that?

3 A. I certainly do. And as I said to you, Dave was crucial
4 because when he first looked at and edited the whitepaper that
5 I started writing by hand following doing the code, it was
6 horrendously long. I mean, it is much better now. It's only a
7 short easy-to-read paper.

8 When I first wrote it, I, like many academics, put in too
9 much -- I'm sorry, I'm Australian, but the only word I can
10 think of is wankery. It's a good way of describing what
11 academics get like. It was nearly 60 pages long. There was a
12 whole lot of complete BS that no one needed to know.

13 And Dave told me to get rid of it. I did. So yes, if it
14 had been a 60-page paper full of academic wankery, no one would
15 read it. So he was critical in that.

16 Q. Dr. Wright, do you recall me asking you whether it was true
17 that the only reason you reached out to the Kleiman estate was
18 because you needed them because you now needed to answer
19 questions about W&K which was owned by the Kleimans?

20 A. No. Actually my ex-wife owned a chunk of it. One of my
21 companies owned a chunk of it. There were no questions about
22 W&K the way he's making out. The transaction that was being
23 investigated was not W&K. It was the GST on Bitcoin.

24 As I stated, the tax office wanted to put GST on Bitcoin
25 transactions which would mean every single time you moved a

1 Bitcoin, even on your own, like yourself, you would pay ten
2 percent. So imagine if you moved your money from one bank
3 account that you own to another bank account that you own and
4 the government takes ten percent of your money.

5 And I fought them right until 2017. And it's my private
6 ruling that people don't realize is a private ruling on the
7 thing. And the equivalent of the Supreme Court over here ruled
8 in favor of me. They said Bitcoin should not have GST. That
9 wasn't until 2017, though.

10 So I had to fight them from 2009 right up until 2017 to get
11 the government to finally admit that money should not be taxed
12 as goods and services.

13 MR. FREEDMAN: Ms. Vela, can you put P137 on the
14 screen for just counsel and the witness.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, do you recognize this as an Australian Taxation
17 Office government document sent to your accountant and in the
18 very second sentence it's talking about yourself?

19 MR. FREEDMAN: And, Ms. Vela, can you bring us to the
20 first page?

21 BY MR. FREEDMAN:

22 Q. Do you see W&K referenced?

23 A. Yes. I see the reference and to myself --

24 Q. There's no foundation laid. The document's not in
25 evidence, Dr. Wright, so don't talk about it until the Court

1 admits it into evidence.

2 MR. FREEDMAN: Your Honor, at this point, we would
3 offer P137 into evidence.

4 MS. MCGOVERN: Your Honor, this is an ATO document.
5 We object on foundation, hearsay, relevance.

6 THE COURT: Based on the Court's previous ruling, the
7 objection's noted. It's overruled. It will be admitted into
8 evidence. P137.

9 (Plaintiffs' Exhibit 137 received into evidence.)

10 BY MR. FREEDMAN:

11 Q. Dr. Wright, a moment ago, you told me the ATO never asked
12 questions about W&K. Do you recall that?

13 A. No. That's actually not what I said. I said they weren't
14 auditing W&K. They query everything. They queried my
15 accountant and they queried my lawyer.

16 We had a challenge -- for instance, like Andrew Sommer's
17 firm, Clayton Utz, had put in a \$300,000 bill and we claimed
18 back the GST and tried to claim back as a business expense.
19 The tax office challenged that, and said: "How do we know that
20 these legal services have actually been done," which is
21 actually a stupid thing because it doesn't actually mean that
22 you even need to have legal services done. If I've spent the
23 money in a business, I get to claim it.

24 So we then had to fight that. And we won, but the cost of
25 fighting it cost us another \$200,000 in legal fees. So this is

1 what we were doing. So no, this was not an audit of W&K as
2 you're trying to imply.

3 MR. FREEDMAN: Ms. Vela, can you go to Page 2.

4 BY MR. FREEDMAN:

5 Q. So, Dr. Wright, I show you a list of questions from the
6 Australian Taxation Office all about W&K.

7 Wait, please. Let me finish.

8 MR. FREEDMAN: Ms. Vela, can you go to the second
9 page -- third page, rather.

10 BY MR. FREEDMAN:

11 Q. More questions about W&K.

12 MR. FREEDMAN: Can you go to the next page, Ms. Vela.

13 BY MR. FREEDMAN:

14 Q. More questions about W&K.

15 MR. FREEDMAN: Can you go to the next page, Ms. Vela.

16 BY MR. FREEDMAN:

17 Q. Even more questions about W&K.

18 And when you see that document, Dr. Wright, now the
19 Australian Taxation Office did begin asking you questions about
20 W&K, did they not?

21 A. No, they did not. As I said, they questioned me every
22 single quarter. They questioned me right back from 2009.
23 Every transaction that I ever did, even my lawyers and
24 accountants, external ones, they queried. They queried the
25 bill that we had from KPMG, who were one of our external

1 auditors. The KPMG team reviewed all of the internal audit
2 stuff and signed off on it. We have partner-level things
3 there.

4 And no, this was not correct. The W&K transactions, any of
5 them were every single time they came up. So what he's missing
6 is that this is cherry-picking documents. Every single
7 transaction I made. They even fought the coffee machine. We
8 had an external coffee company come in and do coffee for our
9 staff, cost about \$150 a month. The tax office queried it, and
10 said whether that should be a business expense. And I had
11 to -- just responding cost us several thousand dollars and we
12 can't not respond over a \$150 invoice.

13 Q. Dr. Wright, you know that a confidence scheme is to gain
14 somebody's trust so you can exploit them later? Are you
15 familiar with that term?

16 MS. MCGOVERN: Objection, Your Honor.

17 THE COURT: Sustained.

18 MR. FREEDMAN: Ms. Vela, can you put P124 on the
19 screen.

20 And let's share that with the jury -- it's in
21 evidence -- please.

22 Can you zoom in to the bottom of the email, please,
23 Ms. Vela, from Ira Kleiman.

24 BY MR. FREEDMAN:

25 Q. February 18th, 2014, Ira Kleiman writes to you four days

1 after you first made contact with him and tell him about his
2 brother: "After everything you have shared with me, I feel
3 like I can completely trust you."

4 Do you see that, Dr. Wright?

5 A. Yes. That sounds exactly what a confidence man would do.

6 Q. Then, Dr. Wright, you knew the Australian Taxation Office
7 was going to reach out to Ira Kleiman about W&K, didn't you?

8 A. No. Actually, I had no idea. Ira Kleiman wasn't actually
9 part of it. The reason they reached out was that he was using
10 Dave's email. That's what I didn't realize at the time. So
11 Ira was pretending to be Dave and W&K. So no, I did not
12 realize that Ira Kleiman would be pretending to be his brother
13 who was dead.

14 Q. And then, Dr. Wright, on March 11th, 2014, the Australian
15 Taxation Office does reach out. Wait, no. Strike that.

16 You receive the letter we -- on March 11th, 2014, you
17 received the letter we looked at from the Australian Taxation
18 Office asking you five pages' worth of questions from W&K,
19 correct?

20 A. No. Actually we received different ones for every company.
21 I think there were about 300 pages worth of questions all up.
22 So if you want to pick a particular five pages and go: "Oh,
23 look, this is what happened," that's wrong. There were
24 300-plus pages.

25 MR. FREEDMAN: Ms. Vela, can you put P137 on the

1 screen.

2 Can we scroll through the pages of this document.

3 Please tell me when you get to the final page, Page 7.

4 BY MR. FREEDMAN:

5 Q. Bottom right-hand corner, Dr. Wright, Page 7 of 7. There
6 are not 300 questions attached to this email, are there?

7 A. No, not this particular one, but you'll notice that each of
8 these things references different areas and there were other
9 documents. For instance, the Tourist Refund Scheme
10 application, that was a little exercise where what we did was I
11 purchased Bitcoin into one of my companies and moved it
12 overseas so we could claim both the plus and the minus on GST
13 to show how ridiculous it was to actually do this sort of
14 thing.

15 It didn't actually make any money; it cost money. Because
16 what I did was I took \$34 million worth of Bitcoin out of
17 Australia. I, first of all, sold it from my company to myself
18 and then moved it into Singapore. And then I claimed -- I,
19 first of all, put the cost of the sale, which was 10 percent of
20 the 34 million, and then I claimed back the other. And I did
21 this -- and this is also the public document that we're talking
22 about is -- references me. And that went to court, too, and
23 eventually I won.

24 And that was part of how the government ended up realizing
25 how stupid the idea of taxing Bitcoin would be in that way, and

1 that you should tax gains, not GST.

2 So this is a very short summary document that references
3 all the other documents.

4 MR. FREEDMAN: Ms. Vela, can you highlight the date,
5 March 11th, 2014, for me in the top right corner of Page 1.

6 BY MR. FREEDMAN:

7 Q. "Dear, Mr. Chesher: As part of our audit process, we would
8 like to request some further information, documentation in
9 relation to Dr. Craig Wright. In this regard, could you please
10 answer the questions set out in the attachment to this letter
11 and return them by 25th of March, 2014."

12 MR. FREEDMAN: Ms. Vela, can you go to Page 1 -- 2,
13 sorry. Thank you.

14 BY MR. FREEDMAN:

15 Q. "W&K," question 1, 2, 3, "W&K"? Do you see that?

16 A. Yes. Like I said, the same with everything. Every
17 transaction, everything we did, they questioned.

18 Q. Question 4, "W&K," do you see that?

19 A. Yes, I do. Like I said, again, every single transaction we
20 did, they questioned.

21 Q. Question 6, "W&K," do you see that?

22 A. I certainly do. And like on the last page, Page 7, where
23 they did the Tourist Refund Scheme, all of this was a zero
24 transaction. What you're neglecting to tell people is that it
25 had an input and an output transaction.

1 He's trying to say that I received \$10 million into my
2 company. I didn't. I had an \$11 million cost on the other
3 side. If you take half of the thing, and you have a rather
4 biased view of it, it looks very different. It looks like I'm
5 trying to receive \$10 million. But when I have to pay the 11
6 first and then beg the government to get 10 million back, it's
7 a very different transaction.

8 Q. Actually, the Australian Taxation Office found that you
9 didn't spend \$11 million, and it was a tax scheme; isn't that
10 correct?

11 A. No. Actually, the \$11 million was the GST. So again,
12 you're misinterpreting and trying to paint this the wrong way.
13 So I would -- what they did find was that we spent the money
14 and that I owed them the \$11 million, but the other side of the
15 transaction, where I get the 10 million back, that was the bad
16 one. So they tried to have their cake and eat it too. They
17 wanted to take the \$11 million but not give back the 10 and a
18 half.

19 Q. Question 7, "Director of W&K," last words on the line. Do
20 you see that, Dr. Wright?

21 A. I do.

22 MR. FREEDMAN: Ms. Vela, can you go to the next page
23 for us, please.

24 BY MR. FREEDMAN:

25 Q. Question 8, "W&K Info Defense" referenced again. Do you

1 see that?

2 A. I certainly do.

3 Q. Question 9, W&K Info Defense referenced again. Do you see
4 that, Dr. Wright?

5 A. Yes, because this is part of what they were asking in this
6 particular quarter. But as I said, every quarter, every
7 transaction.

8 Q. This is what they were asking about this particular
9 quarter, correct?

10 MS. MCGOVERN: Objection, Your Honor. Asked and
11 answered.

12 BY MR. FREEDMAN:

13 Q. Correct?

14 A. No. That's not what I said. I said every transaction.

15 THE COURT: Sustained.

16 MS. MCGOVERN: Objection, Your Honor, asked and
17 answered.

18 THE COURT: The objection is sustained.

19 MR. FREEDMAN: Ms. Vela, can you bring us back to the
20 first page so we can check the date.

21 BY MR. FREEDMAN:

22 Q. March 11th, 2014, right, Dr. Wright?

23 A. Yes. Like I said, every quarter, every single quarter we
24 got audited.

25 MR. FREEDMAN: Ms. Vela, can you leave that on the

1 left-hand side of the screen, please, for me. And can you
2 bring up P138 which is already in evidence.

3 BY MR. FREEDMAN:

4 Q. Dr. Wright, on the right-hand side, we're looking at an
5 email from yourself to Ira Kleiman dated March 11th, 2014.
6 Same day. Do you see that?

7 A. Yes. I was trying to make sure that he got his shares.
8 That was a difficult process because he didn't want to pay tax.

9 Q. I just asked if you saw the date, Dr. Wright. Do you see
10 the date?

11 A. I do, and my statement stands.

12 MR. FREEDMAN: Ms. Vela, can you highlight the bottom
13 part of the email, please. And can you call it out for us so
14 it's easy to read.

15 BY MR. FREEDMAN:

16 Q. "You and your father own 10,642,000 shares. That's 49.5
17 percent of the founder shares."

18 Do you see your email to Ira Kleiman promising 49.5 percent
19 of a company?

20 A. No. It's 49.5 percent of the founder shares. That is not
21 49 percent of the company. So, no. You're misstating that
22 again.

23 And I also see how he had the right to appoint a director
24 if he chose that role. The director role came with a salary of
25 \$150,000 a year. You had to basically do the equivalent of

1 maybe 30 days' worth of work a year to get 150,000, and he
2 turned it down because of tax.

3 And I see the right to sell when the company is floated and
4 he complains that I didn't offer him enough money when I
5 offered him 12 million. Except, well, he had the right to sell
6 them to anyone else. If anyone else would have paid him more
7 than 12 million, he could have sold them. No one did.

8 MR. FREEDMAN: Ms. Vela, can you highlight the date on
9 Dr. Wright's email promising Ira Kleiman 49.5 percent of the
10 founder shares. Can you just pull it out of the document and
11 highlight it, and can you pull out the date of the Australian
12 Taxation Office's request for more information about W&K?

13 Can you line them up next to each other.

14 BY MR. FREEDMAN:

15 Q. Dr. Wright, you promised Ira Kleiman 49.5 percent of the
16 founder shares in Coin-Exch. the exact same day the Australian
17 Taxation Office sent you five pages of questions about W&K,
18 didn't you?

19 A. Well, yes. And you want to know why? It's very simple.
20 Because every single weekday I got communications from the tax
21 office. Every weekday. So you can always say: "You did this
22 on this day." Every single day.

23 So there is no single day in that entire year, including
24 some public holidays, that I did not receive correspondence
25 from the tax office.

1 So looks a bit different when you basically -- it's like
2 saying you received correspondence on a weekday. Yes, I did.

3 MR. FREEDMAN: Ms. Vela, can you put down the callouts
4 for us so we can get back to the two documents.

5 And -- one second for me.

6 (Pause in proceedings.)

7 MR. FREEDMAN: On the right document, Ms. Vela, can
8 you bring me to the last page, please. One page back. Okay.

9 BY MR. FREEDMAN:

10 Q. So, Dr. Wright, on the same day, you attach -- you also
11 send financial -- a balance sheet about Coin-Exch. where --

12 MR. FREEDMAN: Ms. Vela, can you please zoom in to the
13 intellectual property component of the assets.

14 BY MR. FREEDMAN:

15 Q. -- where you say that \$38.4 million worth of the value in
16 Coin-Exch. is in its R&D and intellectual property. Do you see
17 that?

18 A. Yes. I actually see that's what we spent. So if you look
19 at the research and development pool that's up -- the '13, '14
20 part was 12.9 million. And the 15 pool is the expenditure we
21 paid for staff from '14 and '15 after Dave died. So the amount
22 that you're looking at for when Dave was alive was 12.9 million
23 Australian and the amount that we then invested for the
24 oncoming year, which is valid in accruals, was another 25
25 million. So we spent another 25 million on top of what was

1 there when I first founded it.

2 Q. That's what the document you sent to Ira Kleiman says,
3 right?

4 A. No. I had my secretary send this. So I arranged for it to
5 be sent, if that's what you mean.

6 Q. And it shows that the total value of Coin-Exch. is over \$60
7 million?

8 A. No. This is the amount spent. Okay. So you can't value a
9 company on how much you spend. You can only value it on what
10 someone else will pay.

11 Q. Do you see the word: "Fixed assets" on the top?

12 A. Yes. Yes, I do.

13 Q. Do you know how to read a balance sheet?

14 A. Sorry?

15 Q. Do you know how to read a balance sheet?

16 A. Yes. Actually, I do.

17 Q. Fixed assets is not expenditure; it's assets.

18 A. No. You're actually looking at capitalization. So see, I
19 can understand that you may not get this. I was -- I worked in
20 an audit firm.

21 Now, fixed assets doesn't mean the value at market. It
22 means how much you've expended. So anyone in the jury who's
23 maybe run a business, what you will know is if you buy
24 something, you pay for services, you capitalize goods. And
25 that capitalization doesn't mean that they're valued at that.

1 For instance, if you buy a car, five years later if you
2 haven't fully depreciated, the car might not be worth what the
3 book value is. So ...

4 MR. FREEDMAN: Thank you, Ms. Vela.

5 BY MR. FREEDMAN:

6 Q. Dr. Wright, out of the \$60 million shown on this balance
7 sheet, Ira Kleiman got nothing; isn't that correct?

8 A. He was offered \$12 million. He chose not to take that.

9 Q. Dr. Wright, as you expected, the Australian Taxation Office
10 reaches out to Ira Kleiman shortly after they reach out to you;
11 isn't that correct?

12 A. No. As I said, I didn't expect them to reach out to him.
13 What they did was they reached out to Dave Kleiman and Ira
14 pretended to be David Kleiman.

15 MR. FREEDMAN: Ms. Vela, can you put P727 on the
16 screen for just counsel and the witness.

17 And can we go to Page 4, please.

18 BY MR. FREEDMAN:

19 Q. And, Dr. Wright, do you recognize this as an email from Ira
20 Kleiman to yourself talking about W&K? You see that on Page 4?

21 A. I do, sir.

22 MR. FREEDMAN: Your Honor, Plaintiffs offer P727 into
23 evidence.

24 MS. MCGOVERN: No objection.

25 THE COURT: All right. Admitted into evidence.